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NOTICE OF PREPARATION OF AN ENVIRONMENTAL IMPACT REPORT

Date of Publication: March 8, 2008

Lead Agency: Planning Department, City and County of San Francisco
1650 Mission Street, Suite 400, San Francisco, CA 94103

Agency Contact Person: Leigh Kienker **Telephone:** (415) 575-9036

Project Title: 2007.0128E: Drew School Addition

Project Sponsor: Drew School

Project Contact Person: Alice Suet Yee Barkley/Denis F. Shanagher **Telephone:** (415) 356-4635

Project Address: 2901 California Street and 1831-1835 Broderick Street

Assessor's Block(s) and Lot(s): Block 1029, Lots 3 and 95

City and County: San Francisco

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would demolish an existing 40-foot-tall, three-story-over-basement
oderick Street (Assessor's block 1029, Lot 3) in the Lower Pacific Heights
t a three-story-over-basement, 40-foot-tall addition to the existing Drew
treet (Assessor's Block 1029, Lot 95). There would be about a 15 percent
rollment (from about 243 students to approximately 280). The project
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rsal space, and classrooms. The entrance to the theater/assembly space
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uilding at 1831-1835 Broderick Street was constructed in 1891, prior to the
be considered an historical resource for CEQA purposes. The 18,000-
the west side of Broderick Street, between California and Pine Streets.
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units, a variance (under *Planning Code* Section 305) from the rear yard
34(a)(2)), issuance of demolition and building permits by the Department
oval of a parcel map merging Lots 3 and 95 and ancillary street and
n by the Bureau of Streets and Mapping of the Department of Public
tment of Parking and Traffic for any curb or road modifications. The
Mixed, Low Density (RM-1) zoning district and 40-X height and bulk

er(s), if Applicable: N/A

**SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN
ORT IS REQUIRED.** This determination is based upon the criteria of the
State CEQA Guidelines, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on April 7, 2008 Written comments should be sent to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

State Agencies. We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

Mar 6, 2008

Bill Wycko, Acting Environmental Review Officer

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Project Contact Person:	Alice Suet Yee Barkley/Denis F. Shanagher	**Telephone:** (415) 356-4635
Project Address:	2901 California Street and 1831-1835 Broderick Street	
Assessor's Block(s) and Lot(s):	Block 1029, Lots 3 and 95	
City and County:	San Francisco	

Project Description: The project would demolish an existing 40-foot-tall, three-story-over-basement residential building at 1831-1835 Broderick Street (Assessor's block 1029, Lot 3) in the Lower Pacific Heights area of San Francisco, and construct a three-story-over-basement, 40-foot-tall addition to the existing Drew School building at 2901 California Street (Assessor's Block 1029, Lot 95). There would be about a 15 percent increase in school population or enrollment (from about 243 students to approximately 280). The project would add approximately 15,604 square feet (sq.ft.) to the existing 26,470-square-foot Drew School building for an assembly room/theater, rehearsal space, and classrooms. The entrance to the theater/assembly space would be off the courtyard, connecting the new and existing buildings. The existing 21-space basement/underground parking garage would not change. The project would employ green design principles and be LEED Gold Certified. The existing building at 1831-1835 Broderick Street was constructed in 1891, prior to the 1906 earthquake and fire, and may be considered an historical resource for CEQA purposes. The 18,000-square-foot project site is located on the west side of Broderick Street, between California and Pine Streets. The project would require amendment of an existing Conditional Use authorization (under *Planning Code* Section 303) to construct a school facility in a residential district (*Planning Code* Section 209.3(h)), discretionary review of demolition of residential units, a variance (under *Planning Code* Section 305) from the rear yard requirement (*Planning Code* Section 134(a)(2)), issuance of demolition and building permits by the Department of Building Inspection (DBI); approval of a parcel map merging Lots 3 and 95 and ancillary street and sidewalk permit during construction by the Bureau of Streets and Mapping of the Department of Public Works, and approval by the Department of Parking and Traffic for any curb or road modifications. The project site is within the Residential, Mixed, Low Density (RM-1) zoning district and 40-X height and bulk district.

Building Permit Application Number(s), if Applicable: N/A

THIS PROJECT MAY HAVE A SIGNIFICANT EFFECT ON THE ENVIRONMENT AND AN ENVIRONMENTAL IMPACT REPORT IS REQUIRED. This determination is based upon the criteria of the State CEQA Guidelines, Section 15063 (Initial Study), 15064 (Determining Significant Effect), and 15065 (Mandatory Findings of Significance), and the following reasons, as documented in the Environmental Evaluation (Initial Study) for the project, which is attached.

Written comments on the scope of the EIR will be accepted until the close of business on April 7, 2008 Written comments should be sent to Bill Wycko, San Francisco Planning Department, 1650 Mission Street, Suite 400, San Francisco, CA 94103.

State Agencies. We need to know the views of your agency as to the scope and content of the environmental information that is germane to your agency's statutory responsibilities in connection with the proposed project. Your agency may need to use the EIR when considering a permit or other approval for this project. Please include the name of a contact person in your agency. Thank you.

March 6, 2008
Date

Bill Wycko, Acting Environmental Review Officer

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INITIAL STUDY

Case Number 2007.0128E – Drew School Addition

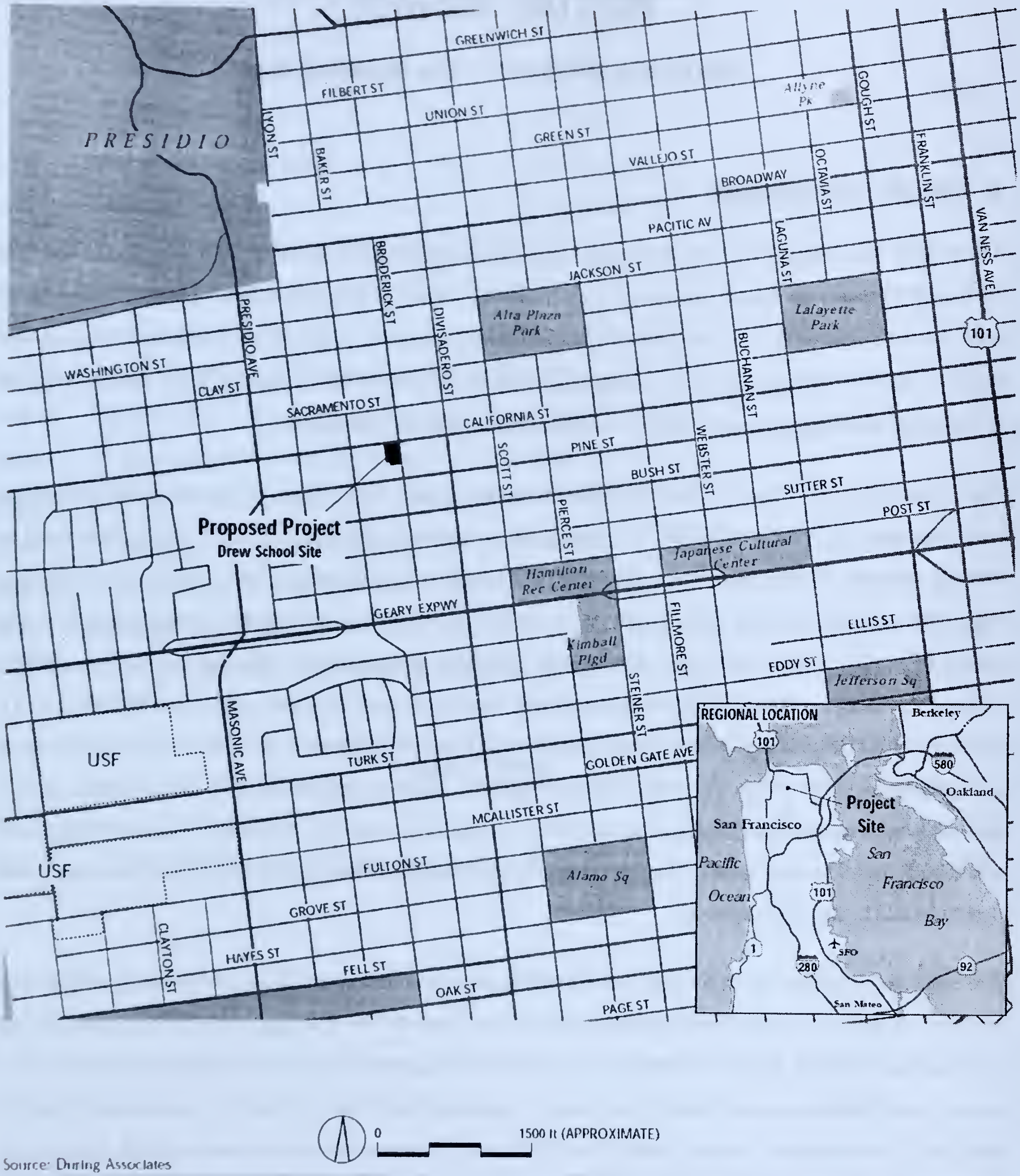
A. PROJECT DESCRIPTION

The project site (Assessor's Block 1029, Lots 3 and 95) is located in Lower Pacific Heights, on the west side of Broderick Street, in the block bounded by Broderick Street to the east, California Street to the north, Baker Street to the west, and Pine Street to the south (see Figure 1, page 2). The purpose of the proposed project is to provide assembly room/performance space and additional classrooms. Drew School acquired the adjacent building in August 2004 to accommodate this facility expansion.

The proposed project would demolish the existing 40-foot-tall, 5,225-square-foot residential, three-story-over-basement, building at 1831-1835 Broderick Street, that was constructed in 1891 and is considered an historic resource. A three-story-over-basement, 40-foot-tall, approximately 15,604-square-foot addition to the Drew School would be constructed on the site and on part of the existing school courtyard. The addition would contain additional classrooms, assembly room/theater, rehearsal space, tech gallery, scenery loft, green room (staging/rehearsal room), restrooms, and circulation space (see Figures 2 to 11, pages 3 to 12). The existing 26,470-square-foot Drew School (established in 1911) would contain a total of approximately 42,074 square feet (sq.ft.) after completion of the proposed addition. The existing 21-space basement/underground parking garage would not change. The existing enrollment of about 243 students and 52 full and part-time faculty would increase to a maximum of 280 students and three additional staff (and increase of about 15 percent).

The proposed addition would occupy Lot 3 and the southern portion of the courtyard and parking level of the existing Drew School (see Figures 2 and 3, pages 3 and 4). The addition would have a green "living wall" facing Broderick Street that would be covered with vegetation to promote habitat preservation. The project would include a roof design that utilizes vegetation and highly reflective surfaces (see Figure 8, page 10). The proposed building would be LEED certified (certified by the Leadership in Energy and Environmental Design green building rating system).

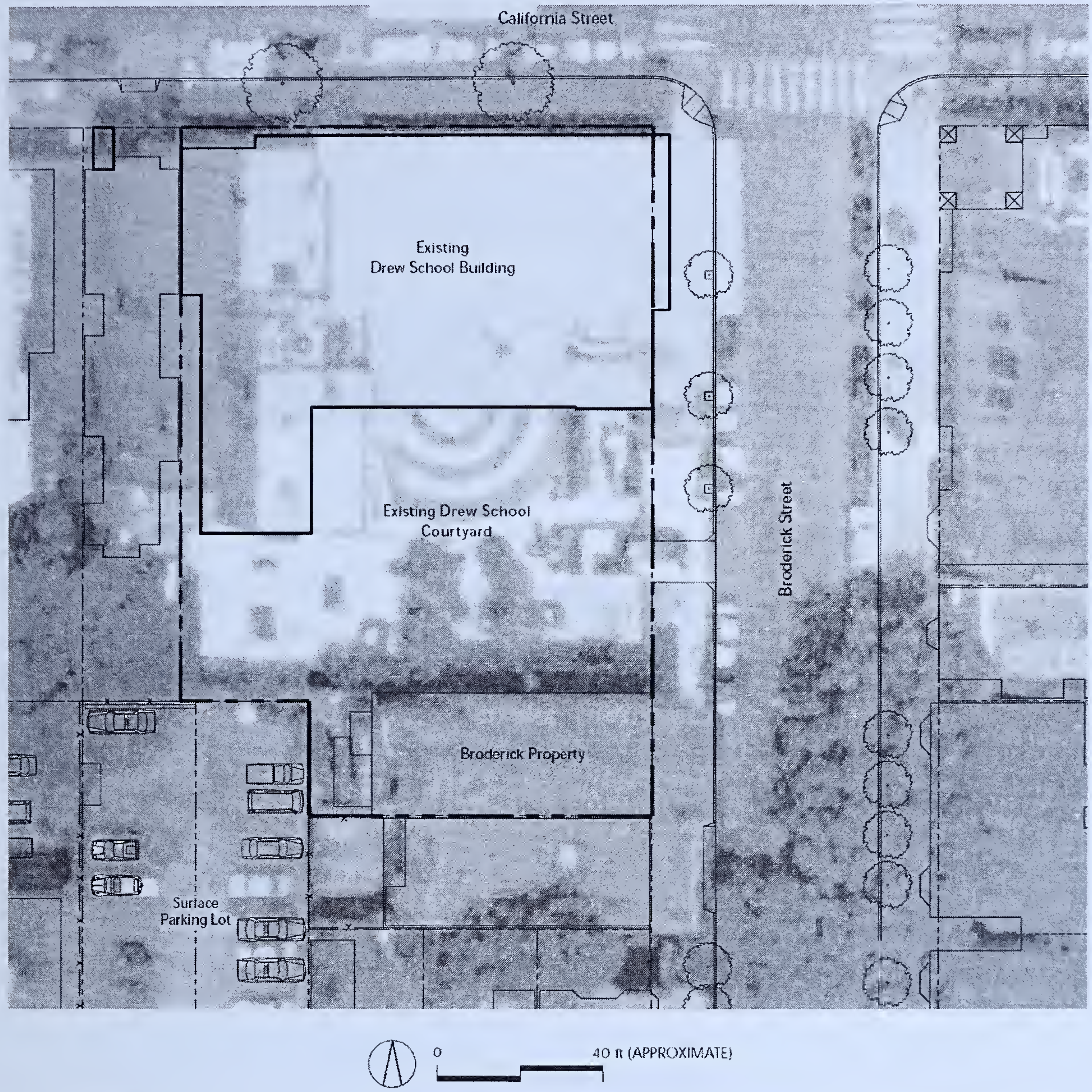
The basement level of the addition would have approximately 5,191 sq.ft. that would contain two classrooms, a rehearsal space, restrooms, and circulation space. The ground level would have about 5,312 sq.ft. that would contain an assembly room/theater and a green room (staging/rehearsal room). The



Source: During Associates

11-29-07

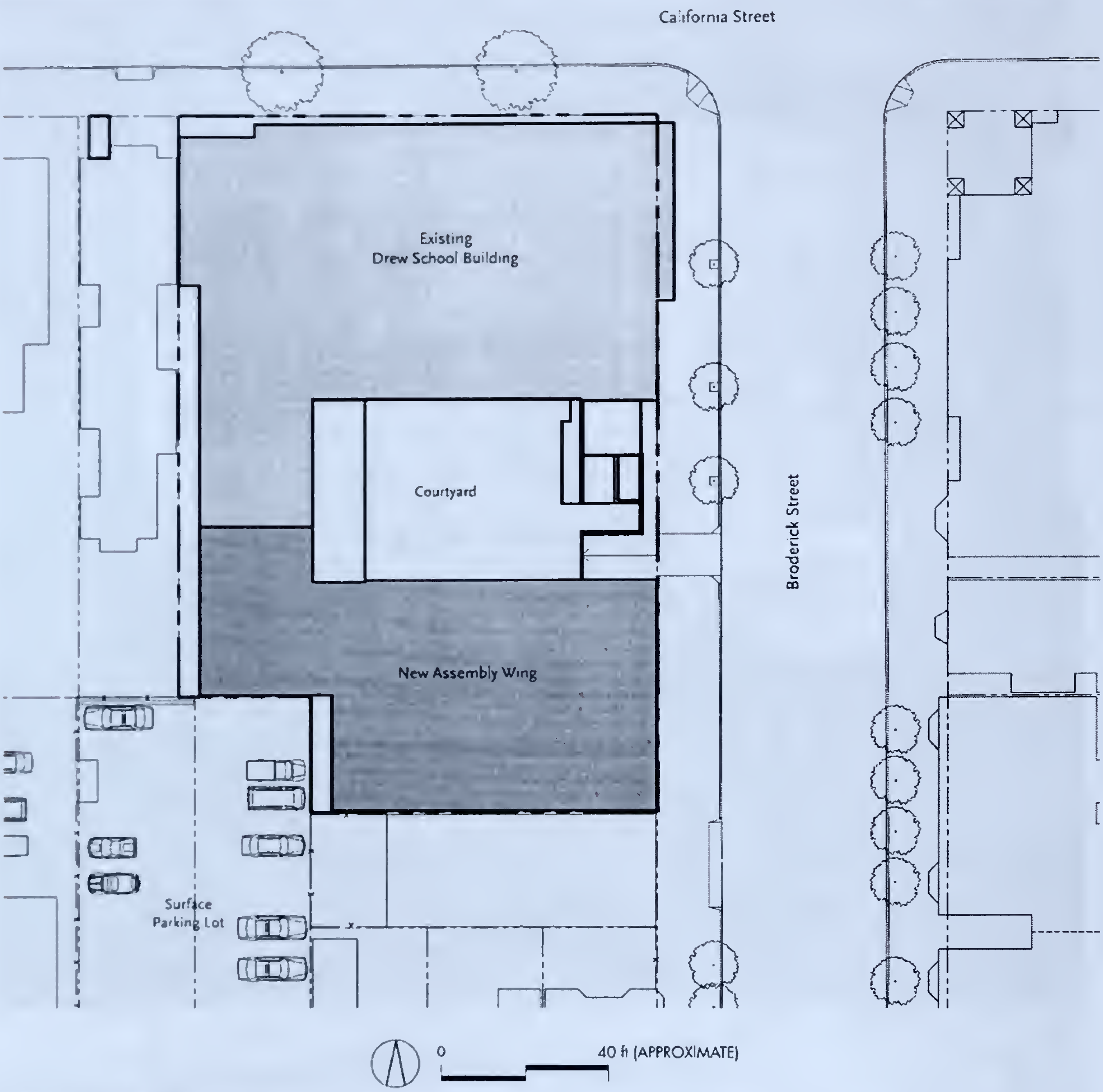
Proposed Project Location Figure 1



Source: Roma Design Group

2-20-08

Existing Site Plan Figure 2



Source: Roma Design Group

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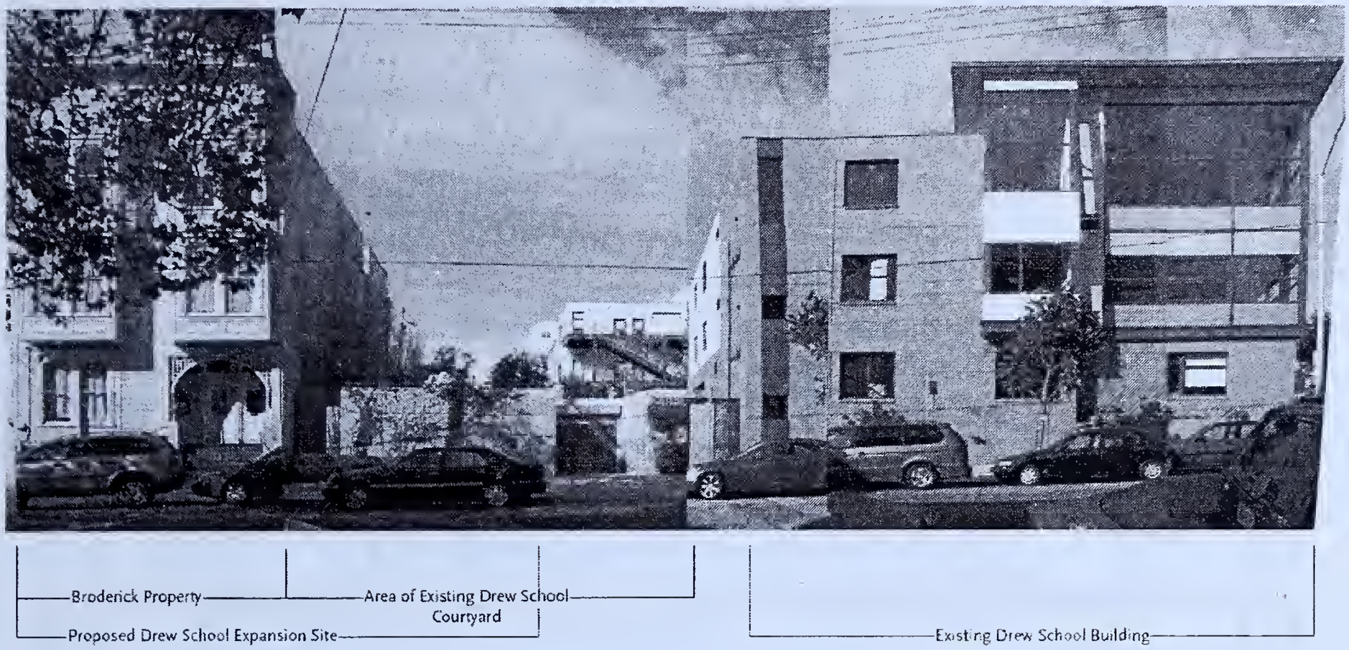
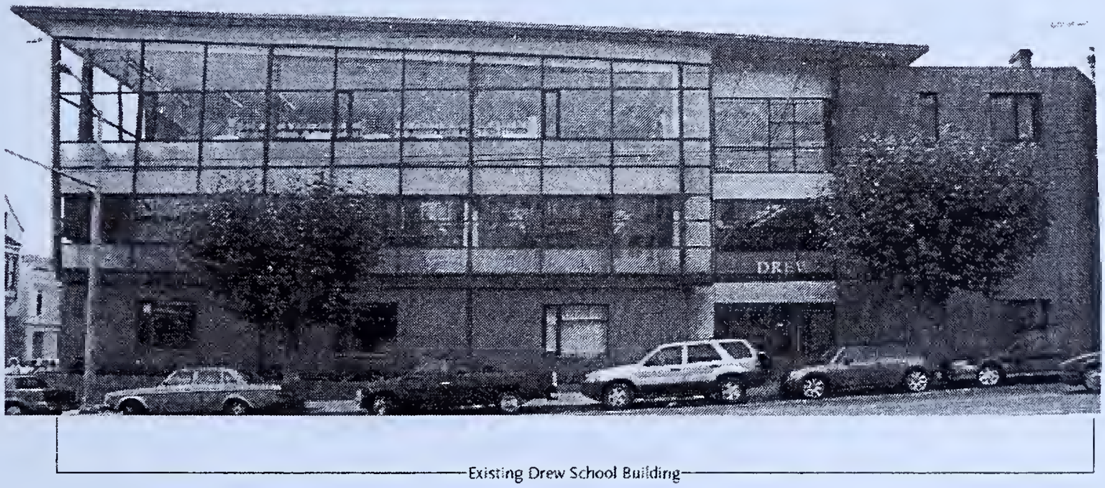
Proposed Drew School Expansion Site Plan Figure 3


Broderick Property
Area of Existing Drew School Courtyard
Proposed Drew School Expansion Site
Existing Drew School Building

Broderick Street

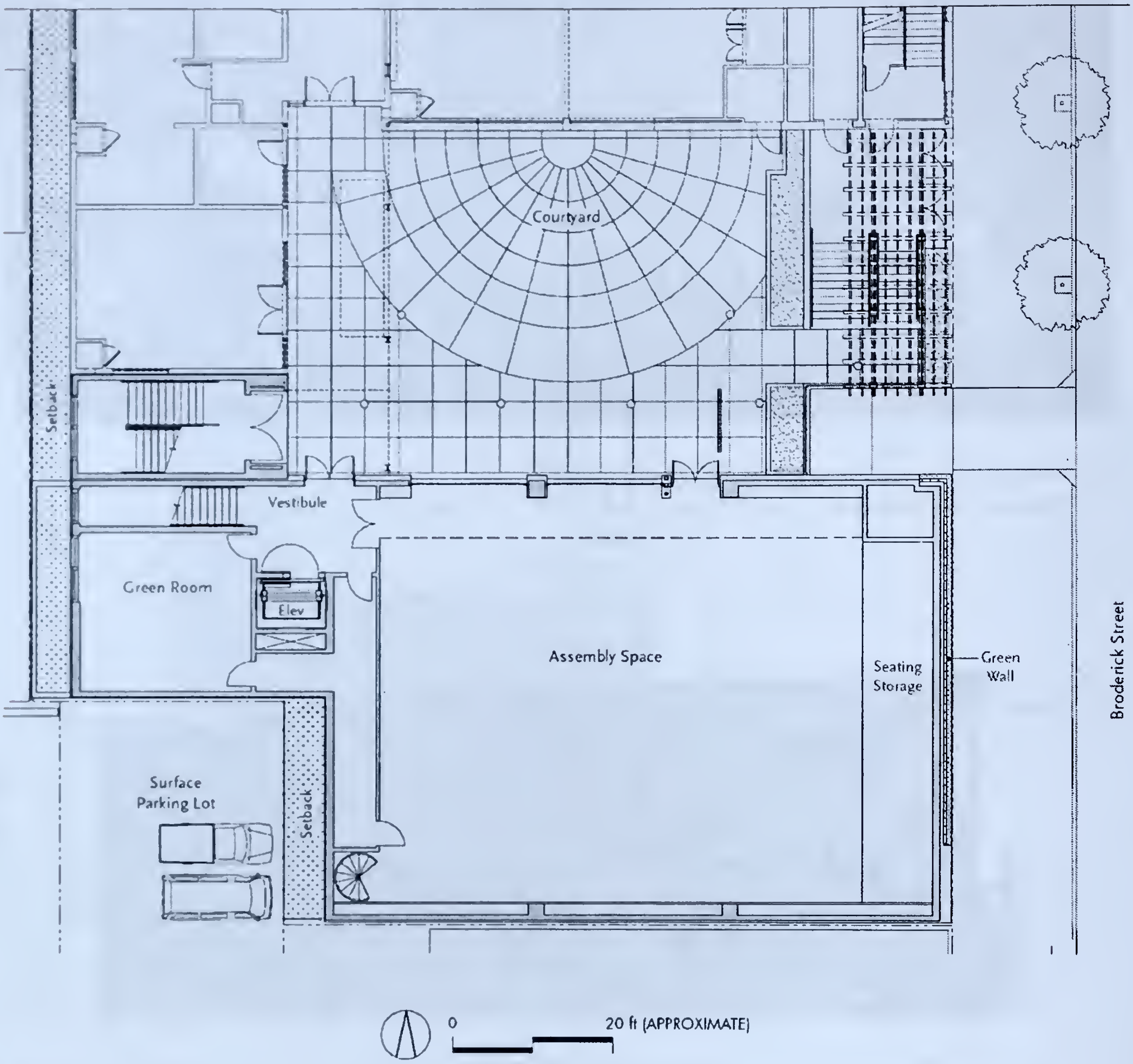


California Street

Source: Roma Design Group

3-3-08

Proposed Expansion Site and Existing Drew School Photos Figure 4



Source: Roma Design Group

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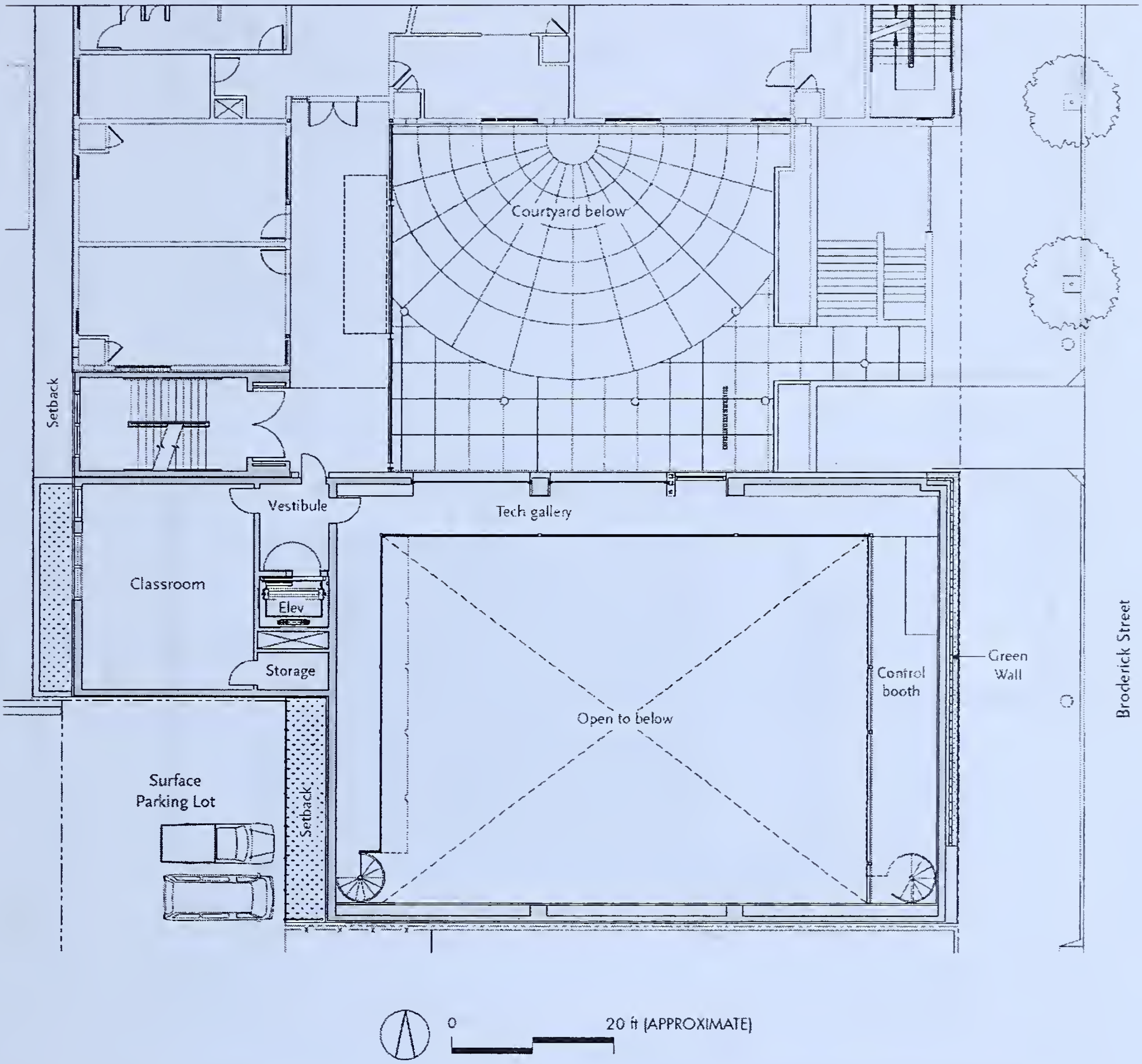
Proposed Drew School Expansion Courtyard Level Floor Plan Figure 5



Source: Roma Design Group

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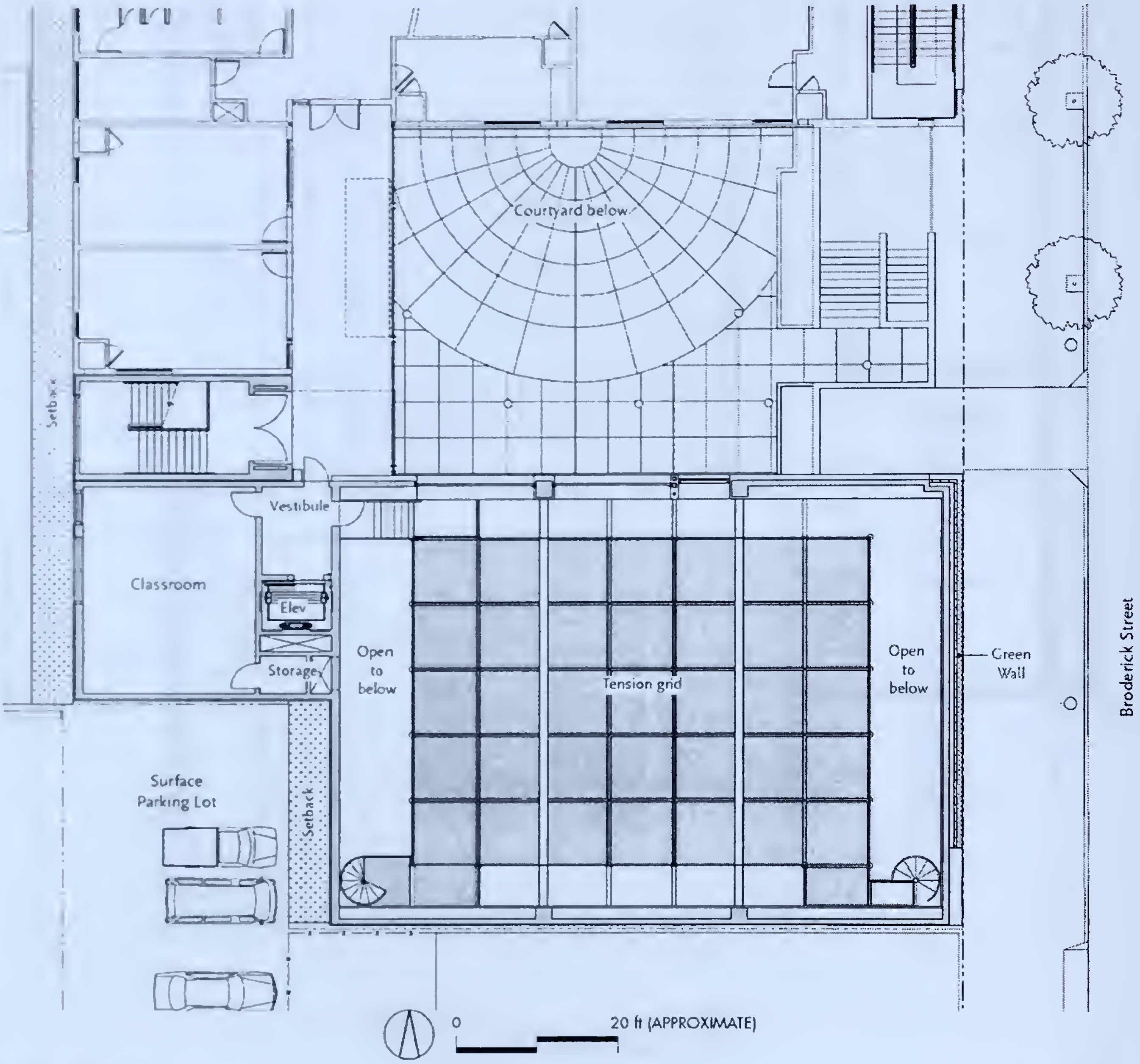
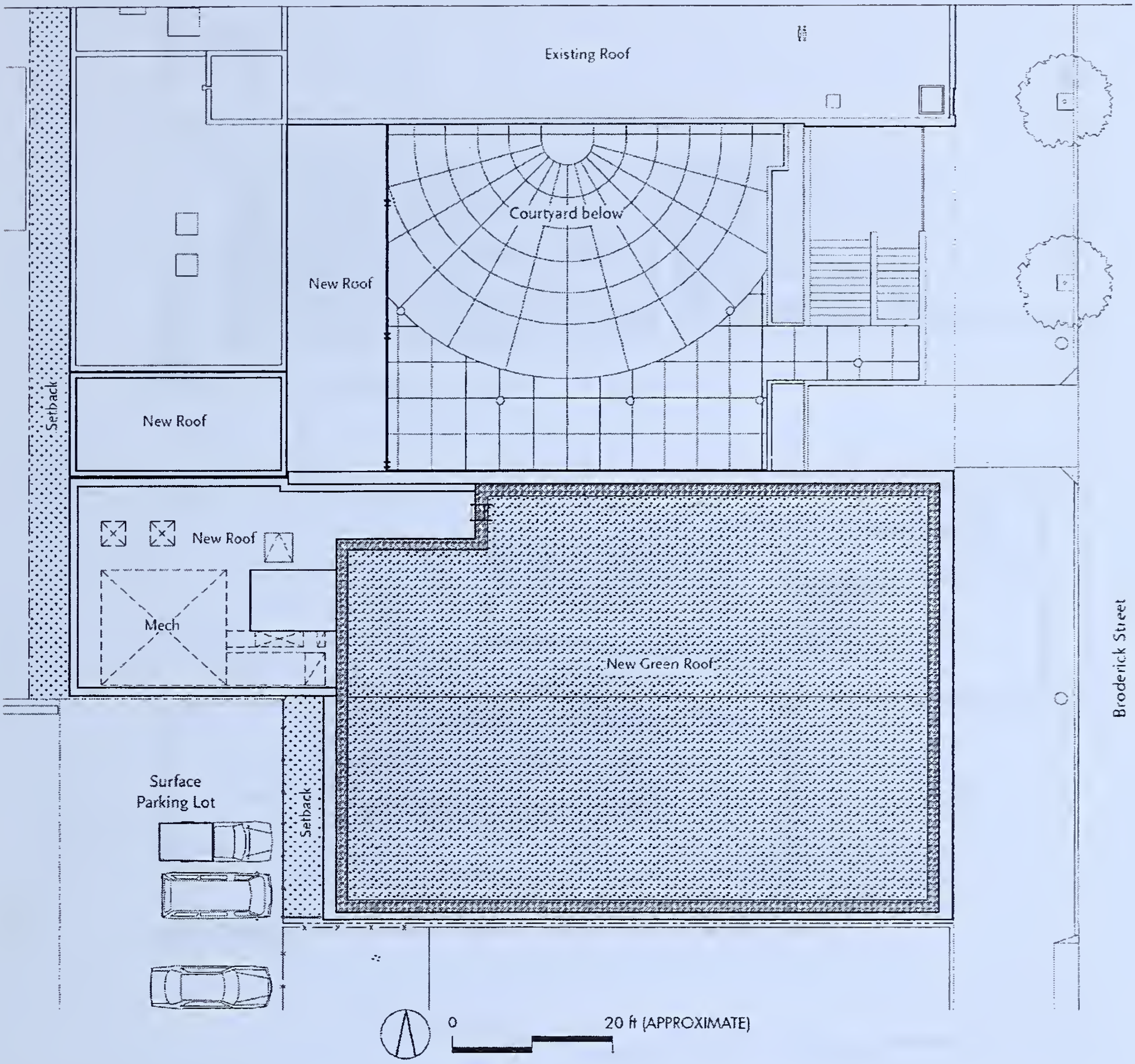
Proposed Drew School Expansion Second Floor Plan Figure 6



Source: Roma Design Group

Proposed Drew School Expansion Third Floor Plan Figure 7



Source: Roma Design Group

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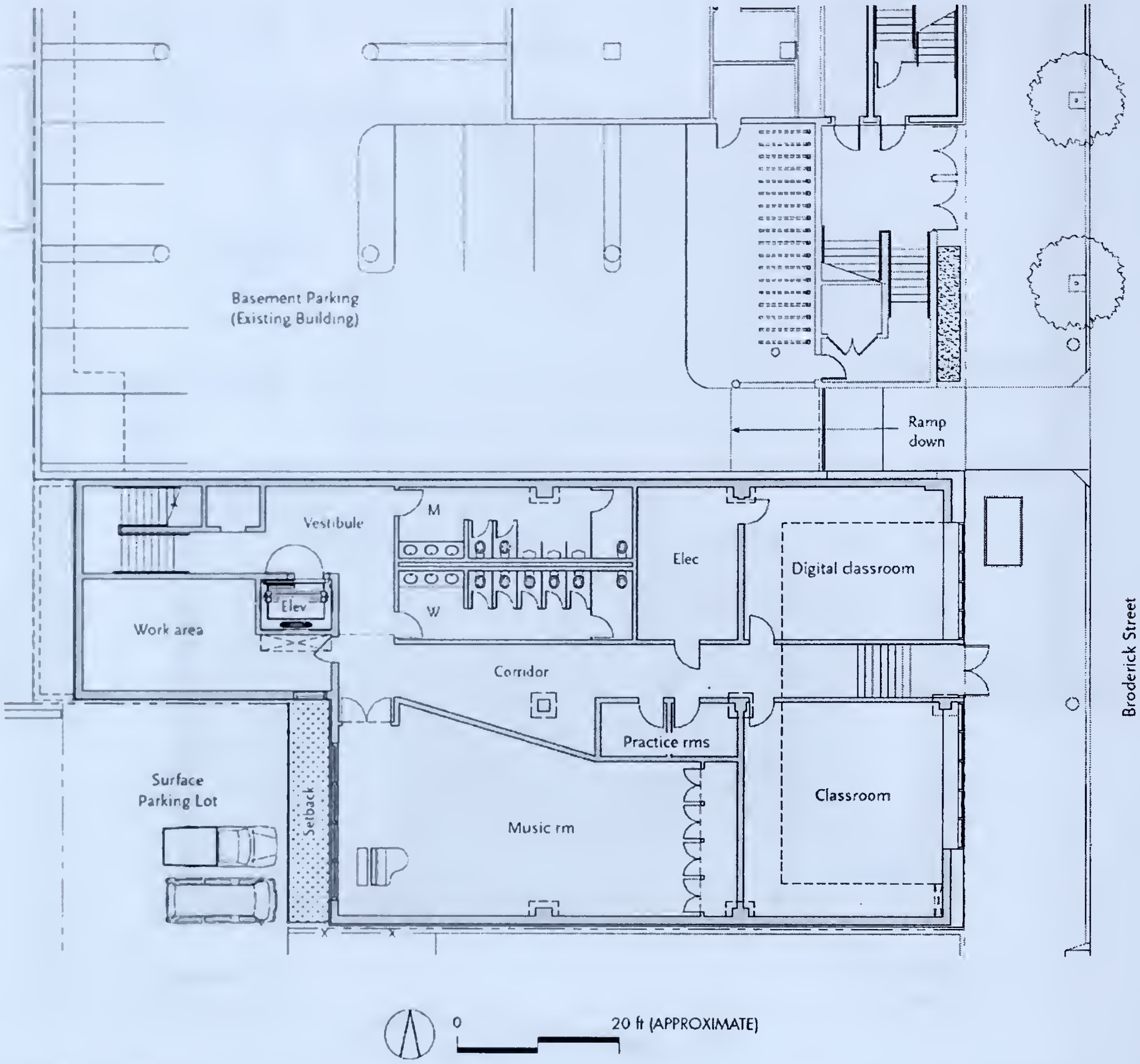
Proposed Drew School Expansion Green Roof Plan   Figure 8



Source: Roma Design Group

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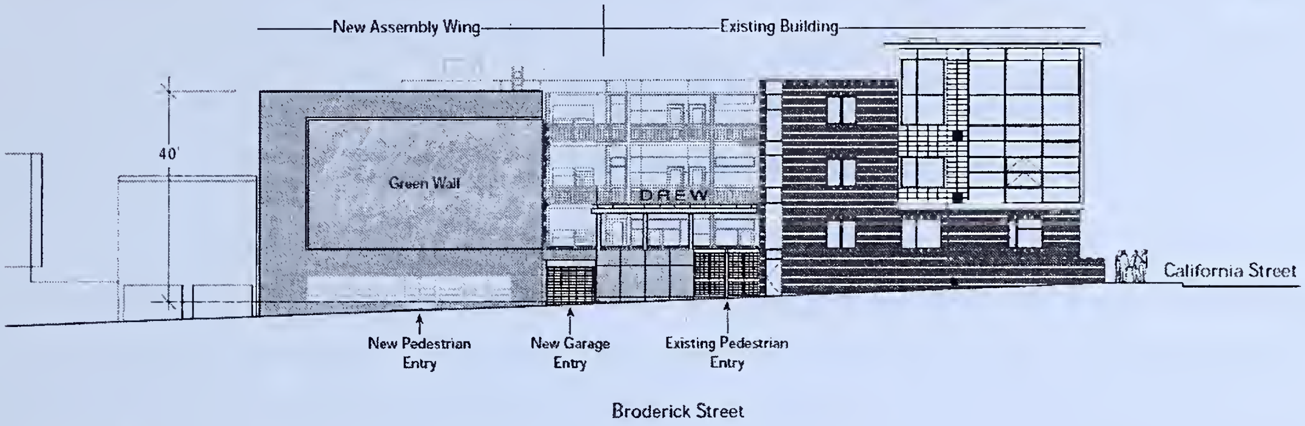
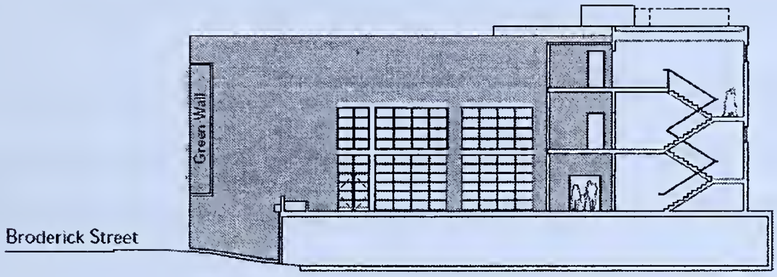
Proposed Drew School Expansion Basement Floor Plan Figure 9



East Elevation



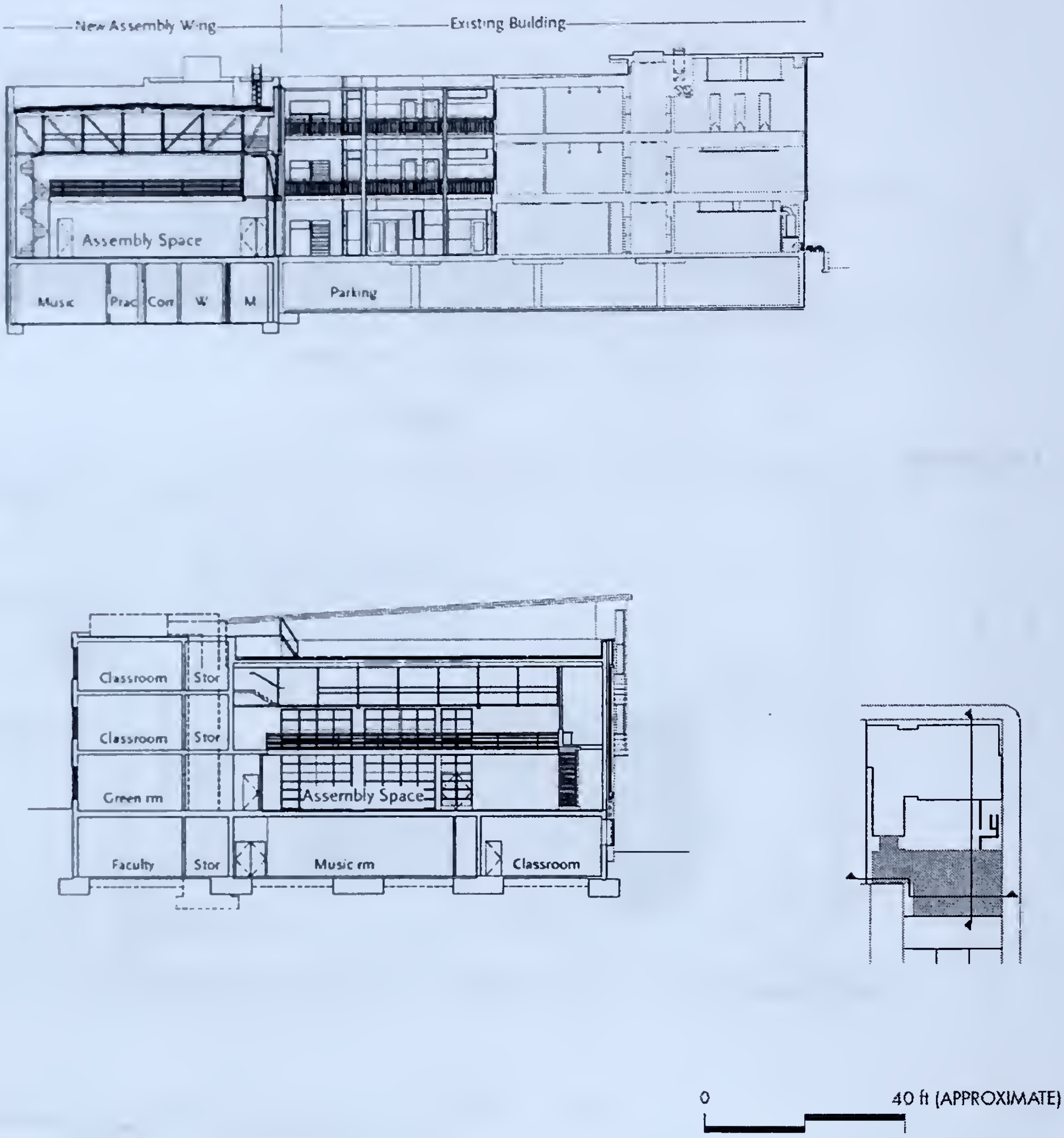
North Elevation

0 40 ft (APPROXIMATE)

Source: Roma Design Group

2-6-08

Proposed Drew School Expansion Project Elevations Figure 10



Source: Roma Design Group

[illegible]

Proposed Drew School Expansion Project Sections **Figure 11** second level would contain approximately 2,359 sq.ft. that includes the upper volume of the assembly/theater, a tech gallery and classroom. The third level would have about 2,742 sq.ft. that would contain the upper volume of the assembly space, a classroom, circulation space, and a scenery loft. There would be approximately 2,300 sq.ft. of usable open space in the courtyard for students and employees. The entrance to the theater/assembly space would be off the courtyard. The main entrance to the school would continue to be on California Street. There would be an entrance to the basement level on Broderick Street.

There are three street trees along the Broderick Street frontage, and two street trees along the California Street frontage. One or more of the street trees along the Broderick Street frontage would be removed to facilitate construction and replaced after the addition is completed. Four evergreen elm trees in the courtyard level of the school, and thirteen white poplar trees at the edge of the courtyard, would be removed. No additional landscaping is planned.

The proposed project would require demolition of a pre-1906 earthquake residential Victorian building, acquired by the school in 2004. It contains three residential flats are intended to be vacant in June 2008.

The project's basement and foundation would require excavation to a depth of approximately 12 feet below the existing sidewalk. The basement foundation would be approximately two to three feet below the level of the existing garage. Approximately 29,000 cubic feet (1,074 cubic yards) of soil would be removed.

Project construction is estimated to take approximately 13 months and the estimated construction cost of the proposed project would be approximately $4.5 million. The project sponsor is the Drew School.

B. PROJECT SETTING

The project site consists of two lots: the 2,269-square-foot (0.05 acre) 1831-1835 Broderick Street lot on the southern end (Assessor's Block 1029, Lot 3) that contains a three-story, residential building (acquired by the school in 2004); and the 15,732-square-foot (0.36 acre) 2901 California Street lot (Lot 95 of Assessor's Block 1029) on the north end that contains the existing Drew School building, courtyard and basement parking garage. The project is located in Lower Pacific Heights on the west side of Broderick Street, in the block bounded by Broderick, California, Baker, and Pine Streets. The project site slopes gently downward to the south, at a slope of approximately five percent, with an elevation ranging from 167 to 170.5 feet (San Francisco City Datum).

South of Lot 3 are two three-story multi-family residential buildings (1825 Broderick Street and 1801 Broderick Street at the northwest corner of Broderick and Pine Streets).

Across the street to the east of the project site, on the southeast corner of Broderick and California Streets, is the three- to five-story Seventh-Day Adventist Church (2889 California Street) with an approximately 60-foot steeple. South of the church on the east side of Broderick Street are a two-story-over-basement two-unit residential building (1832-1834 Broderick Street) and a three-story multi-family residential building at the northeast corner of Broderick and Pine Streets (1816-1826 Broderick Street).

The project site vicinity (within one to two blocks) is a mixed-use area comprised of residential and non-residential land uses that include restaurant, retail, commercial, office, religious, educational, and parking uses. Non-residential uses are concentrated along California Street east of Broderick Street, with residential uses predominating elsewhere, including nearby Broderick and Pine Streets, and California Street west of Broderick Street. Most buildings are low (two to four stories) and, with the exception of the Drew School, date from the early twentieth century. The tallest buildings in the site vicinity are the aforementioned church (2889 California Street) and two seven-story multi-family residential buildings on the northeast corner of California and Broderick Streets and the southeast corner of California and Baker Streets (2890 California Street and 2999 California Street, respectively).

In contrast to the buildings west of Broderick Street, most of the buildings east of Broderick Street have non-residential uses on the ground floor (retail, commercial, restaurant, office) with residential uses on the upper floors. Broderick Street north of California Street is also occupied by two- to seven-story single- and multi-family residential buildings dating primarily from the early twentieth century.

Both sides of Pine Street to the east and west of Broderick Street are occupied by single- and multi-family residential buildings dating primarily from the early twentieth century, and ranging in height from two to four stories. On the north side of Pine Street west of Broderick is a paved surface parking area, accessed from Pine Street, that extends northward to the southwest corner of the existing Drew School (Lot 95) and the western boundary of the 1831-1835 Broderick Street site (Lot 3). The school leases approximately 11 spaces on the lot from the Seventh Day Adventist Church. There is no direct access from the school grounds to the parking lot.

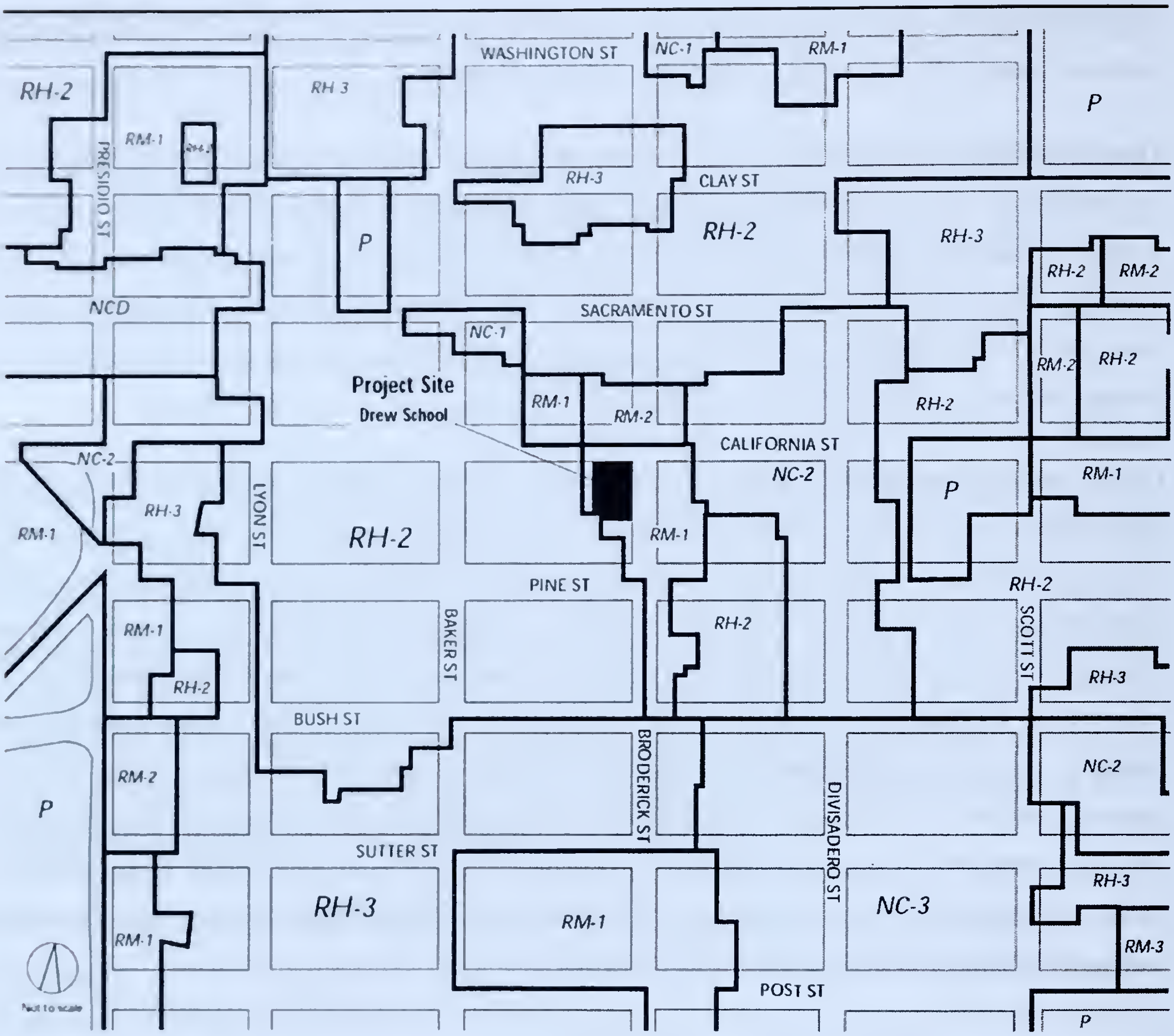
Sensitive receptors include the students and employees of the existing Drew School; occupants of the residential buildings on Broderick Street adjacent to the project site to the south and opposite the project site to the east, and of the nearby residential buildings on the north side of Pine Street and the south side of California Street west of Broderick Street; and churchgoers to the Seventh Day Advent Church on the southeast corner of the California and Broderick streets intersection.

The zoning district of the project site is Residential, Mixed, Low Density (RM-1) and the surrounding area is a mixture of zoning districts, including RM-1 and Neighborhood Commercial Cluster (NC-1) to the northwest, Residential, Mixed, Moderate Density (RM-2) and Residential, House, Two-Family (RH-2) to the north; Small-Scale Neighborhood Commercial (NC-2) to the east; RH-2 to the southeast; RM-1 to the south, and RH-2 to the southwest and west. See Figure 12 on page 16 for a map of zoning districts in the vicinity. The project site is within a 40-X height and bulk district, as is the surrounding area.

Drew School has a pedestrian-only entrance on California Street. California Street, which runs in an east-west direction, has two lanes in each direction with parking on both sides, and 12-foot-wide sidewalks. The school frontage along California Street is approximately 180 feet and is currently in a 2-hour time limit parking area. Broderick Street, which runs in a north-south direction, provides the vehicular entrance to the school parking garage and a pedestrian entrance. In the vicinity of the school, Broderick Street is one travel lane in each direction with parking on both sides and 15-foot-wide sidewalks. The school frontage along Broderick Street between California Street and the garage access point is approximately 96 feet long and currently there is an approximately 75 feet long (sufficient for three vehicles) white zone closest to the garage access point and two 2-hour time limited spaces closest to California Street. Pine Street is a one-way westbound street, and in the vicinity of Drew School has three lanes with parking on both sides, and 12-foot sidewalks.

C. COMPATIBILITY WITH ZONING, PLANS, AND POLICIES

	Applicable	*Not Applicable*
Discuss any variances, special authorizations, or changes proposed to the *Planning Code* or Zoning Map, if applicable.	☐	☒
Discuss any conflicts with any adopted plans and goals of the City or Region, if applicable.	☐	☒
Discuss any approvals and/or permits from City departments other than the Planning Department or the Department of Building Inspection, or from Regional, State, or Federal Agencies.	☒	☐



Source: San Francisco Planning Department, During Associates

2.7.08

Existing Zoning Map Figure 12

SAN FRANCISCO PLANNING CODE

The *San Francisco Planning Code (Planning Code),* which incorporates the City's Zoning Maps, implements the *San Francisco General Plan* (*General Plan*) and governs permitted uses, densities, and configuration of buildings within the City. Permits to construct new buildings (or to alter or demolish existing ones) may not be issued unless (1) the proposed project conforms to the *Planning Code*, (2) allowable exceptions are granted pursuant to provisions of the *Planning Code*, or (3) amendments to the *Planning Code* are included as part of the proposed project.

The project site is within the Residential, Mixed, Low Density (RM-1) zoning district and a 40-X height and bulk district. School facilities are a conditionally permitted use in a RM-1 district.

APPROVALS

The proposed project would require the following approvals:

- Conditional Use authorization (under *Planning Code* Section 303) for a school use in a RM-1 district *Planning Code* Section 209.3(h)). This authorization would amend the 1999 Conditional Use authorization for the existing school and increase the enrollment from 250 to 280 students.
- Variance (under *Planning Code* Section 305) from the rear yard requirement to provide necessary assembly space in the new building. (*Planning Code* Section 134(a)(2)).
- Discretionary Review by the Planning Commission for demolition of the three residential units on the project site. (*Planning Code* Section 311).

The project would also require approval by the Department of Building Inspection (DBI) for demolition and site or building permits, and approval by the Bureau of Streets and Mapping of the Department of Public Works for a parcel map merging Lot 3 and Lot 95, and street and sidewalk permits. Any curb or road modifications would require approval by the Department of Parking and Traffic.

The 1999 Conditional Use authorization allowed the reconstruction and intensification of the existing school, including increased enrollment from 200 to 250; provision of a 21- to 23-space parking garage, and the creation of a passenger loading zone on Broderick Street.[1] All the conditions of the original authorization would continue with the exception of the increase of enrollment to 280 students and the addition of the assembly wing.

---

[1] Other conditions included prevention of student loitering in residential areas, containment of noise and light on school premises, prevention of double parking, encourage use of public transit and alternative means of transportation, appointment of a community liaison officer, provision of a traffic control monitor, and limitation of special evening and weekend events to two per month.

PLANS AND POLICIES

San Francisco Plans and Policies

In addition to the *Planning Code* and zoning policies, development in the City is subject to the *General Plan*. The *General Plan* provides general policies and objectives to guide land use decisions. Any conflict between the proposed project and policies that relate to physical environmental issues are discussed in Section C, Evaluation of Environmental Effects. The compatibility of the proposed project with *General Plan* policies that do not relate to physical environmental issues will be considered by decision-makers as part of their decision whether to approve or disapprove the proposed project. Any potential conflicts identified as part of the process would not alter the physical environmental effects of the proposed project. *General Plan* policies compatible with the proposed project include the following.

The proposed project would be consistent with Objectives 1, 2 11, 16, and 24 of the Transportation Element of the *General Plan*. The Drew School is located in a high-density infill area well served by public transit, and the school employs a bus service. In addition, those students who do come by car are predominantly in carpools that arrive at a City-permitted drop-off area on Broderick Street. The majority of students come to school either by foot or by transit. The school intends to dedicate one of their city-issued street parking permits to preferred parking for alternative fuel vehicles and is currently exploring the feasibility of alternative fuel vans. The "living wall" proposed on the California Street façade would be intended to enhance the pedestrian environment.

The proposed project would conform to Objectives 1 through 4 of the Urban Design Element. The proposed expansion would be built to the same height as the existing school and the existing residential structure on Broderick Street, reflecting the predominant building height in the project vicinity, and would not disturb any scenic views. The proposed expansion would be built to complement the design of the existing school, and as noted above, the proposed "living wall" would be intended to enhance the environment. Although the proposed expansion would reduce the size of its courtyard, the courtyard would continue to serve the school as onsite open space. The proposed expansion would also provide an assembly room/theater and rehearsal space.

The proposed project would generally comply with Objective 1 of the Commerce and Industry Element of the *General Plan*. It would expand the educational program of the school already in place, thus minimizing undesirable consequences, such as introduction of a new use.

The proposed project would comply with San Francisco's *Building Code*, thus minimizing the risk to property from natural disasters and reducing the risk of social, cultural, or economic dislocations, and complying with Objective 2 of the Community Safety Element of the *General Plan*.

The demolition of the residential structure at 1831-1835 Broderick Street would not conform to Objective 3 of the 1990 Residence Element (and Objective 2 of the 2004 Housing Element), which seeks to discourage demolition of sound residential structures.

In November 1986, the voters of San Francisco approved Proposition M, the Accountable Planning Initiative, which added Section 101.1 to the City *Planning Code* to establish eight Priority Policies. These policies, and the sections of this Environmental Evaluation addressing the environmental issues associated with the policies, are: (1) preservation and enhancement of neighborhood-serving retail uses; (2) protection of neighborhood character (Question 1c, Land Use); (3) preservation and enhancement of affordable housing (Question 3b, Population and Housing, with regard to housing supply and displacement issues); (4) discouragement of commuter automobiles (Questions 5a, b, f, and g, Transportation and Circulation); (5) protection of industrial and service land uses from commercial office development and enhancement of resident employment and business ownership (Question 1c, Land Use); (6) maximization of earthquake preparedness (Questions 13 a-d, Geology, Soils, and Seismicity); (7) landmark and historic building preservation (Question 4a, Cultural Resources); and (8) protection of open space (Questions 8 a and b, Wind and Shadow, and Questions 9a and c, Recreation).

Prior to issuing a permit for any project that requires an Initial Study under the California Environmental Quality Act (CEQA), and prior to issuing a permit for any demolition, conversion, or change of use, and prior to taking any action that requires a finding of consistency with the *General Plan*, the City is required to find that the proposed project or legislation would be consistent with the Priority Policies. As noted above, the consistency of the proposed project with the environmental topics associated with the Priority Policies is discussed in the Evaluation of Environmental Effects, providing information for use in the case report for the proposed project. The case report and approval motions for the proposed project will contain the Department's comprehensive project analysis and findings regarding consistency of the proposed project with the Priority Policies.

The proposed project would not require an Institutional Master Plan, (*Planning Code* Section 204.5) because the requirement only applies to post-secondary schools. Drew School is a four-year secondary educational institution (grades 9 through 12).

REGIONAL PLANS AND POLICIES

The five principal regional planning agencies and their over-arching policy-plans to guide planning in the nine-county bay area include the Association for Bay Area Governments' (ABAG) "*A Land Use Policy Framework*" and *Projections 2005*, the Bay Area Air Quality Management District's (BAAQMD's) *Clean Air Plan* and *Bay Area 2005 Ozone Strategy*, the Metropolitan Transportation Commission's *Regional Transportation Plan – Transportation 2030*, the San Francisco Regional Water Quality Control Board's *San Francisco Basin Plan*, and the San Francisco Bay Conservation and Development Commission's *San Francisco Bay Plan*. Due to the size of the proposed project, there would be no anticipated conflicts with regional plans.

D. SUMMARY OF ENVIRONMENTAL EFFECTS

The proposed project could potentially affect the environmental factor(s) checked below. The following pages present a more detailed checklist and discussion of each environmental factor.

☐ Land Use
☐ Aesthetics
☐ Population and Housing
☒ Cultural Resources
☐ Transportation and Circulation
☐ Noise
☒ Air Quality
☐ Wind and Shadow
☐ Recreation
☐ Utilities and Service Systems
☐ Public Services
☐ Biological Resources
☐ Geology and Soils
☐ Hydrology and Water Quality
☒ Hazards/Hazardous Materials
☐ Mineral/Energy Resources
☐ Agricultural Resources
☒ Mandatory Findings of Signif.

Except for the categories of historic architectural resources, the items on the Initial Study Environmental Evaluation Checklist have been checked "Less Than Significant with Mitigation Incorporated," "Less Than Significant Impact," or "No Impact," indicating that upon evaluation, staff has determined that the proposed project could not have a significant adverse environmental effect. For the topics of historical architectural resources, where the conclusion is "Potentially Significant Impact," further analysis of the topic as well as of possible mitigation measures and alternatives will be included in the EIR. For all of the items checked "Less Than Significant with Mitigation Incorporated," "Less Than Significant Impact," or "No Impact," the conclusions regarding potential significant adverse environmental effects are based upon field observation, staff experience and expertise on similar projects, and/or standard reference material available within the Department, such as the Department's *Transportation Impact Analysis Guidelines for Environmental Review*, or the California Natural Diversity Data Base and maps, published by the California Department of Fish and Game. For each checklist item, the evaluation has considered the impacts of the project both individually and cumulatively.

E. EVALUATION OF ENVIRONMENTAL EFFECTS

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
1. **LAND USE AND LAND USE PLANNING—** Would the project:					
a) Physically divide an established community?	☐	☐	☐	☒	☐
b) Conflict with any applicable land use plan, policy, or regulation of an agency with jurisdiction over the project (including, but not limited to the general plan, specific plan, local coastal program, or zoning ordinance) adopted for the purpose of avoiding or mitigating an environmental effect?	☐	☐	☒	☐	☐
c) Have a substantial impact upon the existing character of the vicinity?	☐	☐	☒	☐	☐

Land use impacts are considered significant if the proposed project would physically divide an established community; conflict with any applicable land use plan, policy, or regulation; or if there would be a substantial impact upon the existing character of land uses in the vicinity.

The proposed project, which is an addition to the existing Drew School, would replace an existing three-story-over-basement residential building and a portion of the Drew School courtyard at the site with a three-story-over-basement expansion of the Drew School. The proposed project would be constructed within the existing lot boundaries. It would not interfere with or change the existing street plan or impede the passage of persons or vehicles. The proposed project would not change the area land uses or their intensity. Thus, the proposed project would not result in an impact to disrupt or divide the established neighborhood.

The proposed project would be consistent with all relevant plans, planning codes, and zoning. The *Planning Code* allows for granting CU authorization to expand the existing Drew School educational use to a residential site and granting the zoning variance from the rear yard provision requirements of the RM-1 district that the proposed project would require for Lot 3. The purpose of the rear yard requirements is to provide interior open space corridors in residential blocks. In order to provide the necessary assembly space for the school, the proposed project addition would change the existing building footprint on Lot 3 by expanding to approximately 8 ½ feet from the west property line and reducing the existing courtyard to the north. The project would include a connection from the existing school to the new assembly building that would be set back about five from the west property line (similar to the existing building). Although the project would not meet the *Planning Code* requirement for set back, there would still be open space similar to the existing conditions (see Figure 2, page 3).

LAND USE CHARACTER

The proposed addition to the existing educational institution would expand the use and increase the enrollment by about 15 percent to 280 students As part of the Drew School 1999 conditional use authorization, the enrollment was capped at 250 students.

The proposed project would expand the school facility but would be consistent with the mixed land use character of the area. The proposed addition would be similar in scale to the existing Drew School building on the project site. The proposed project would appear to, and would in fact, wrap the educational facility around the corner of the building, similar to California Street. While the proposed project would expand the current educational use to an additional lot, extending the use down Broderick Street an additional 25 percent of the block-face, an expansion of that size would not be substantial in the context of the neighborhood setting, nor adversely change the character of Broderick Street or that of surrounding land uses. The proposed project's impact on existing land use character would, therefore, not be considered a significant impact.

CONCLUSION

The proposed project would expand the educational use on the project site, but would not physically divide an established community, nor conflict with adopted land use plans, nor substantially and adversely alter the land use character of the vicinity. Therefore, the proposed project's land use impacts would be less than significant.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
2. AESTHETICS—Would the project:					
a) Have a substantial adverse effect on a scenic vista?	☐	☐	☒	☐	☐
b) Substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment which contribute to a scenic public setting?	☐	☐	☐	☒	☐
c) Substantially degrade the existing visual character or quality of the site and its surroundings?	☐	☐	☒	☐	☐
d) Create a new source of substantial light or glare which would adversely affect day or nighttime views in the area or which would substantially impact other people or properties?	☐	☐	☒	☐	☐

The nearest vistas from public open spaces under the jurisdiction of the Recreation and Park Department are from Alta Plaza Park, located approximately four blocks northeast of the project site in the area bounded by Scott, Jackson, Steiner, and Clay, Streets; Clay Street Mini-Park, located approximately four blocks northwest of the project site on the south side of Clay Street between Baker and Lyon Streets; Presidio Library Mini-Park, located approximately three blocks northwest of the project site on the north side of Sacramento Street between Baker and Lyon Streets; and Bush and Broderick Mini-Park, located approximately two blocks southwest of the project site on the south side of Bush Street between Broderick and Baker Streets. Due to the topography, the presence of intervening buildings, and the distance between the project site and this open space, the project would not be visible from this or other parks and, thus, would not block vistas from them. The proposed project, at 40 feet in height, would be visible from nearby street segments but would not obstruct public scenic views of the parks. Project impact on scenic vistas and views would be less than significant.

The project would not substantially damage scenic resources, including, but not limited to, trees, rock outcroppings, and other features of the built or natural environment that contribute to a scenic public setting, as there are no such features present on the project site.

The proposed project would be visible from some nearby residential buildings in the area. However, the magnitude of the effect on private views would be limited by the existing intervening Drew School and the church buildings on the southeast corner, and west of Broderick and California Streets. Also, the proposed addition would be similar in height to the existing 1831-1835 Broderick Street building. The proposed project's impact on private views would not rise to the level of a potentially significant environmental impact.

The proposed school addition would be architecturally consistent with the existing Drew School building and its California Street frontage. The courtyard void along Broderick Street would be continued with the proposed project. The massing of the addition would be similar to the existing school building on the Broderick Street side.

The proposed project would be 40 feet tall, similar in height to a number of the buildings in the immediate vicinity and shorter than the seven-story multi-family residential building on the northeast corner of California and Broderick Streets. It would be approximately the same height as the existing building, one story higher than the existing residences on the west side of Broderick, and about the same height as the existing buildings on the east side of Broderick Street. The proposed project would increase the prominence of the school along Broderick, but would be consistent with the visual character the Drew School has introduced into the existing neighborhood. Impacts to historic resources will be discussed in the EIR, and are discussed in this Initial Study on page 28.

Design and aesthetics are, by definition, subjective and open to interpretation by decision-makers and members of the public. A proposed project would therefore be considered to have a significant adverse effect on visual quality under CEQA only if it would cause a substantial and demonstrable negative change. The proposed project would not cause such a change. While expanding the institutional presence on the immediate setting, the proposed project would not add a new or visually inconsistent presence to the area. For these reasons, the proposed project would not be expected to cause a substantial and demonstrable negative change or disruption to the existing visual character of the project vicinity. However, the project's environmental effect on aesthetics and urban design in the immediate setting will be presented in the EIR in the interest of disclosing and explaining these impacts.

The project would replace the street tree(s) removed along Broderick Street. A unique educational feature of the building would be a garden or "living wall" to promote habitat preservation on the exterior façade on Broderick Street wrapping around the corner on the north side (see Figure 10, page 11).

The lighting of the proposed addition would be similar to that of the existing school building. The Broderick Street frontage of this addition would not have glazing above the ground floor. The addition wall is north facing and the courtyard would have a bank of multistory windows at the assembly entrance (approximately 25 feet set back from the street). The addition would be expected to both add and reduce spillover lighting by adding illumination but blocking much of the street exposure with the mass of the new building.

The project would comply with Planning Commission Resolution 9212, which prohibits the use of mirrored or reflective glass. Mirrored glass would not be used in the new building. Exterior lighting would be consistent with similar exterior lighting and the fixtures would be directed to minimize the project site. For these reasons, the proposed project would not generate obtrusive light or glare that would substantially impact other properties and project impacts would be less than significant. For the aforementioned reasons, aesthetic impacts of the project would be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
3. **POPULATION AND HOUSING—** Would the project:					
a) Induce substantial population growth in an area, either directly (for example, by proposing new homes and businesses) or indirectly (for example, through extension of roads or other infrastructure)?	☐	☐	☐	☒	☐
b) Displace substantial numbers of existing housing units or create demand for additional housing, necessitating the construction of replacement housing?	☐	☐	☒	☐	☐
c) Displace substantial numbers of people, necessitating the construction of replacement housing elsewhere?	☐	☐	☐	☒	☐

The 2000 U.S. Census indicates that the population in the project vicinity is approximately 1,867 persons.[5] In March 2001, the Association of Bay Area Governments (ABAG) projected regional needs in the Regional Housing Needs Determination (RHND) 1999-2006 allocation and calculated the jurisdictional need of the City as 20,327 dwelling units, or an average yearly need of 2,716 net new dwelling units. Although not finalized at this time, the RHND 2006-2013 allocation for the City is anticipated to be higher than the 1999-2006 allocation.[2]

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[5] The population estimate is based on data from the 2000 Census for Census Tract 153.

The project site contains three stacked, family-sized dwelling units and the existing Drew School. The proposed project would demolish the existing three-unit, 5,225 gsf residential building and the southern portion of the existing Drew School courtyard, to accommodate a 15,604-square-foot addition to the Drew School. The demolition of the three dwelling units would displace approximately six residents on the site,[3] and the school expansion would lead to the employment of an additional three faculty/administrative staff and accommodate an additional 37 students.[4] The existing residents are schedule to vacate the units by June 2008. Drew school is providing relocation assistance to all current residents.

The net increase in daily onsite population would be approximately 34 people.[2] While noticeable to immediately adjacent neighbors, this increase would not result in a substantial impact on the population of the City and County of San Francisco The net increase of 34 in the daily population at the project site would represent approximately 1.5 percent of the population near the project site, and less than 0.01 percent of the overall population of the City and County of San Francisco.[6] It is anticipated that most or all of the additional students and faculty/employees of the project would be individuals who currently reside in San Francisco or the region; therefore, the additional students and faculty/employees of the proposed project would not substantially increase the overall population of the City and County of San Francisco.

Although most of the three new jobs are anticipated to be filled by current residents of San Francisco or the Bay Area, up to three new employees could move to San Francisco or the Bay Area. Three workers would generate an increased demand for housing of up to approximately two dwelling units (at a ratio of

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[2] The Regional Housing Needs Allocation for the years of 2006-2014 is currently in its fourth revision. More information on this upcoming housing forecast for the Bay Area can be found at www.abag.ca.gov/planning/housingneeds.

[3] For purposes of analysis, the residence is assumed to be habitable at the average household size for the census tract in which it is located. The project site is located in Census Tract 153, which according to Census 2000 data, has an average household size of 1.97 persons (1.90 per rental unit and 2.11 per owner-occupied unit). The citywide average household size for Census 2000 was 2.3 persons per household.

[4] Alice Suet Yee Barkley/Denis F. Shanagher, *Environmental Evaluation Application, Drew School*, revised January 18, 2007. Currently, Drew School has a total of 52 full and part time teachers and staff, and approximately 250 students. After completion of the proposed project, there would be 55 full and part time teachers and staff and 280 students.

[2] A 1999 conditional use authorization for the school capped the permitted school enrollment at 250 students..

[6] This calculation is based on the estimated Census 2000 population of 776,733 persons in San Francisco.

1.5 employees per household). In addition, displacement of the approximately six residents at the site would result in a demand for three dwelling units. In the context of the overall City housing demand, the demand for five dwelling units for project employees and displaced residents would not be considered to result in a "substantial" increase in demand or burden on new or replacement housing construction, representing 0.02 percent of the City's projected annual dwelling unit construction need. The vacancy rate for rental dwelling units in San Francisco is approximately 4.5 percent at the time of publication.[3] The loss of residential units, however, is also considered a policy issue by the Planning Department and mandatory discretionary review of the project will be taken by the Planning Commission.

The project would be located in an established urban neighborhood in an already developed area, and would not necessitate or induce the extension of municipal infrastructure. In light of the above, the project would not be expected to induce a substantial amount of growth. In conclusion, the proposed project would not induce substantial population growth nor create an additional substantial demand for housing resulting in significant physical environmental effects. The proposed project's population and housing impacts would, therefore, be less than significant.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
4. CULTURAL AND PALEONTOLOGICAL RESOURCES— Would the project:					
a) Cause a substantial adverse change in the significance of a historical resource as defined in §15064.5, including those resources listed in Article 10 or Article 11 of the San Francisco *Planning Code?*	☒	☐	☐	☐	☐
b) Cause a substantial adverse change in the significance of an archaeological resource pursuant to §15064.5?	☐	☒	☐	☐	☐
c) Directly or indirectly destroy a unique paleontological resource or site or unique geologic feature?	☐	☐	☐	☒	☐
d) Disturb any human remains, including those interred outside of formal cemeteries?	☐	☒	☐	☐	☐

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[3] Information obtained from http://www.sfaa.org/0712chapleau.html Accessed on February 1, 2008.

HISTORIC ARCHITECTURAL RESOURCES

The northern portion of the project site is currently occupied by the Drew School, constructed in 2001 and not considered an historic architectural resource. The southern portion of the project site is currently occupied by a three-story-over-basement residential building (1831-1835 Broderick Street) that was constructed in 1891, prior to the 1906 earthquake and fire, and designed by the architect-builder M. J. Welsh. It has been continuously used as residential flats since then. The building at 1831-1835 Broderick Street is not listed in Article 10 of the *Planning Code* (Preservation of Historical Architectural and Aesthetic Landmarks) or the 1976 Planning Department Survey, and is not a rated building in "Here Today" or by Heritage. Under the guidelines in *San Francisco Preservation Bulletin No. 16*, the building, which was constructed prior to 1906, "may be considered a historical resource because of its rarity and additional research will be required to determine whether they meet the California Register criteria and quality as 'historical resources' for purposes of CEQA." Preliminary research has been conducted that concludes that a potential historic district may exist in the area, based on shared architectural features. The period of significance would be from 1870, the beginning of the settlement of the area, to 1906.[4] Given the building's possible status as a historical resource as a contributor to a potential historic district, demolition of the building, as proposed, has the potential to cause a significant adverse affect to a historical architectural resource. The EIR will describe the history, architect, architectural character, and significance of the building on the project site. The EIR will include analysis of the appropriateness of the new design, and alternatives, including discussion of consistency with the Secretary of the Interior's Standards for Rehabilitation of Historic Buildings.

ARCHEOLOGICAL RESOURCES

The ground surface of the project site has already been disturbed by construction of the existing building and basement at 1831-1835 Broderick Street (on the southern portion of the project site) and the existing Drew School (on the northern portion of the project site). The project would require excavation as deep as approximately 12 feet below the existing sidewalk. The project site is underlain by a layer or layers of fill, under which lies fine-grained dune sand. The dune sand is underlain by medium-dense to very dense clayey sand and sand with clay.[5] While (as discussed in Topic 13. Geology and Soils, below) the upper layer(s) of fill at the site were placed during construction of the existing structure, archeological resources present within the site would have been preserved within the native soils below. With implementation of **Mitigation Measure 1, page 76,** the proposed project's potential impact on CEQA-significant archeological resources, including human remains interred outside of formal cemeteries, would be reduced to a less-than-significant-level. Archeological resources, therefore, require no further analysis and will not be included in the EIR.

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[4] Tim Kelley consulting, *Historical Evaluation, 1831-1835 Broderick Street, San Francisco California*. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

There are no known paleontological resources at the project site, and, therefore, the proposed project would not result in any adverse effects on paleontological resources.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
5. TRANSPORTATION AND CIRCULATION— Would the project:					
a) Cause an increase in traffic which is substantial in relation to the existing traffic load and capacity of the street system (i.e., result in a substantial increase in either the number of vehicle trips, the volume-to-capacity ratio on roads, or congestion at intersections)?	☐	☐	☒	☐	☐
b) Exceed, either individually or cumulatively, a level of service standard established by the county congestion management agency for designated roads or highways (unless it is practical to achieve the standard through increased use of alternative transportation modes)?	☐	☐	☒	☐	☐
c) Result in a change in air traffic patterns, including either an increase in traffic levels, obstructions to flight, or a change in location, that results in substantial safety risks?	☐	☐	☐	☐	☒
d) Substantially increase hazards due to a design feature (e.g., sharp curves or dangerous intersections) or incompatible uses?	☐	☐	☐	☒	☐

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[5] Treadwell & Rollo, *Geotechnical Consultation, Assembly Wing Addition, Drew School, San Francisco, California,* 15 November 2006. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
e) Result in inadequate emergency access?	☐	☐	☒	☐	☐
f) Result in inadequate parking capacity that could not be accommodated by alternative solutions?	☐	☐	☒	☐	☐
g) Conflict with adopted policies, plans, or programs supporting alternative transportation (e.g., conflict with policies promoting bus turnouts, bicycle racks, etc.), or cause a substantial increase in transit demand which cannot be accommodated by existing or proposed transit capacity or alternative travel modes?	☐	☐	☒	☐	☐

The proposed project would not result in a change in air traffic patterns, and, therefore, would not result in substantial safety risks related to air traffic, and this issue is not addressed below.

A transportation study has been prepared for the proposed project and is summarized below.[7]

STREET NETWORK

The project site is located in the Lower Pacific Heights area of San Francisco. California Street in the project vicinity is a two-way, east-west street with two travel lanes in each direction, and on-street parking on both sides. In the vicinity of the project, Broderick Street a two-way, north-south street with one travel lane in each direction, and on-street parking on both sides. Pine Street is a one-way westbound street in the vicinity of Drew School, with three travel lanes and on-street parking on both sides.

In the *General Plan*, California Street is designated as a Secondary Arterial in the vicinity of Drew School. Pine Street is designated as a Major Arterial and a Freight Traffic Route.

The intersections of California/Broderick and Pine/Broderick are signalized.

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[7] CHS Consulting Group, *Drew School Assembly Wing Transportation Study*, February 2008. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

TRAFFIC

Intersection operating conditions are described by Level of Service (LOS), which provides a description of an intersection's performance based on traffic volumes, intersection capacity, and vehicle delays. LOS A represents freeflow conditions, with little or no delay, while LOS F represents congested conditions, with extremely long delays; LOS D (moderately high delays) is considered the lowest acceptable level in San Francisco.

The peak morning arrival time at the Drew School (the period of greatest school-generated traffic) coincides with the peak commuter hours on the adjacent streets. During the weekday a.m. peak hour, the intersections of California/Broderick and Pine/Broderick both operate at LOS B (a 13.8 second delay/per vehicle, and a 12.2 second delay/per vehicle, respectively).[6]

Approximately 65 percent of employees and 63 percent of students of the Drew School travel by auto (including students who are dropped off and who carpool).[8] The additional three employees and 37 students would generate up to approximately additional 25 vehicle trips in the a.m. peak period. These trips would be added to the above intersections north and south of the project site. The proposed project may result in average delays of approximately 13.9 seconds per vehicle at the California/Broderick intersection (an increase of 0.1 second) and 12.4 seconds per vehicle at the Pine/Broderick intersection (an increase of 0.2). These 0.1 and 0.2 second increases in average delay would not be substantial and drivers would be unlikely to notice the delay. The proposed project would not change the Levels of Service "B" at the intersections. Project traffic volume impacts would be less than significant.

The Drew School has a policy that requires all parents to use the west side of Broderick Street for student drop-off and pick-up activities.[9] Field observation shows some parents double parked their vehicle and dropped off students on the east side of Broderick Street in the northbound direction. In addition, a few parents traveled northbound on Broderick Street and then made a left turn in front of the school garage driveway, partially blocking the sidewalk, dropped off students, and then reversed the vehicle to go south on Broderick towards Pine Street in both the a.m. and p.m. peak periods. Those students dropped off on the east side of Broderick Street usually jaywalked across the mid-block of Broderick Street. Double parking was also observed occasionally during drop-off and pick-up activities in both directions of

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[6] Ibid, page 14.

[8] Ibid.

[9] Ibid.

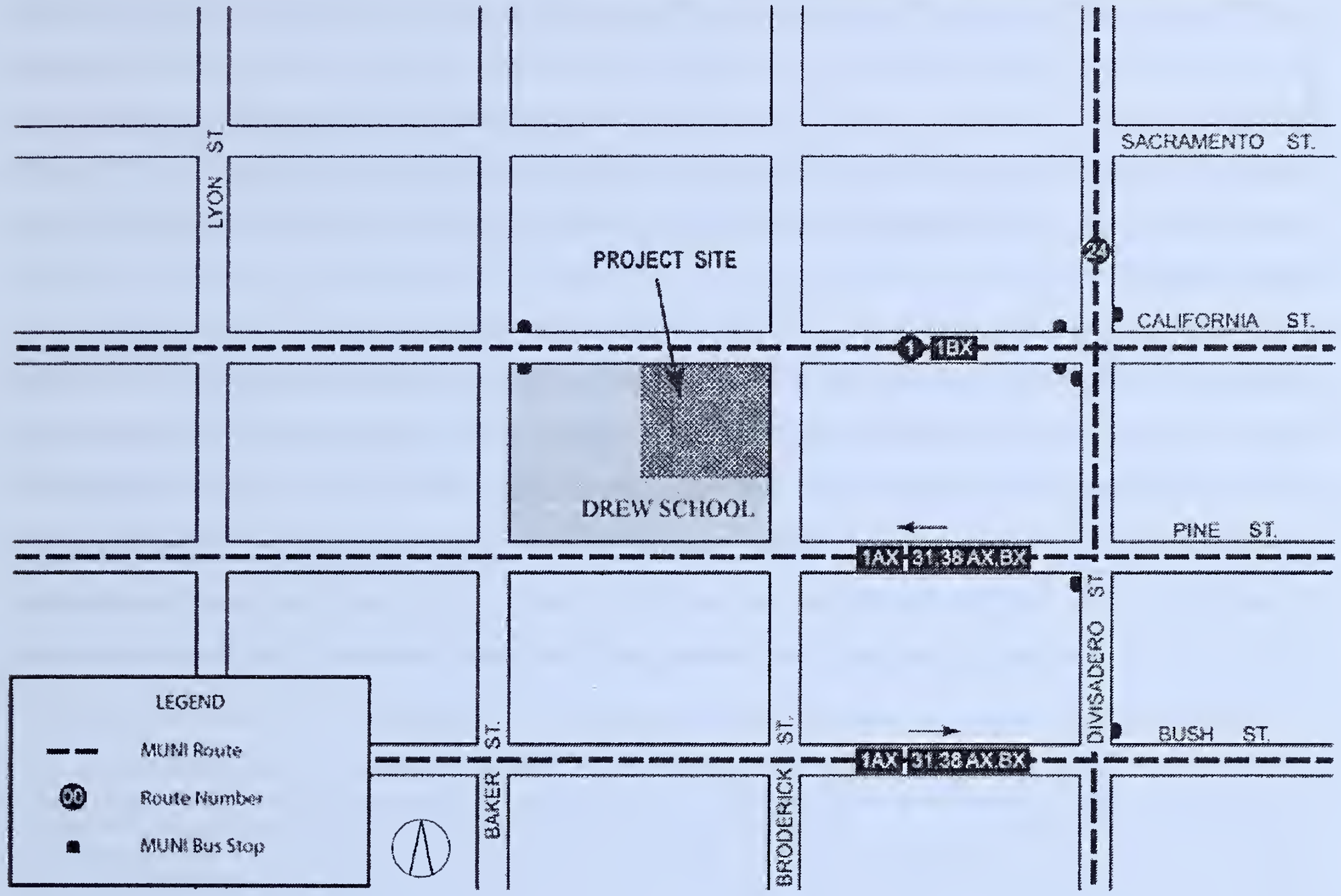
Broderick Street. This violation does not appear to pose significant traffic congestion or safety problems because traffic volume is light along this block of Broderick Street. It does cause a nuisance for the duration of the drop-off and pick-up periods, and potential safety concerns for students jaywalking across Broderick Street.

The project would incrementally contribute to the existing pick-up/drop-off activities along Broderick Street. Extending the existing white zone along Broderick Street, changing the hours of the white zone, providing additional transit information and bike education, incentivizing ride-sharing, continuing to enforce school pick-up/drop-off policy, and enforcing restrictions against left turns and U-turns in the middle of Broderick Street would reduce potential vehicle/vehicle and vehicle/pedestrian conflicts (see **Improvement Measures 1 through 4**, beginning on page 78).

Cumulative traffic growth would occur from other developments throughout San Francisco, as well as from the proposed project. Under 2025 Cumulative conditions, traffic is anticipated to increase in much of the City, and levels of service at some intersections may deteriorate to unacceptable levels (LOS E or LOS F). Although local neighborhood traffic would be expected to increase at intersections in the project vicinity, it is unlikely that the increase would be substantial because of limited neighborhood development potential. These conditions would occur with or without the project and the proposed project's contribution of 25 vehicle trips to total 2025 Cumulative volumes and to the growth between Existing and 2025 Cumulative conditions would be small. The project would therefore not be expected to contribute significantly to 2025 Cumulative conditions, and would not have any significant cumulative traffic impacts.

TRANSIT

The project site is well served by public transit, with MUNI and regional transit providing service in the immediate vicinity (see Figure 13, page 33, for a map of existing transit networks and stop locations). MUNI lines passing within one block of the project site include the 1-California, 1AX-California "A" Express, 1BX-California "B" Express, 24-Divisadero, 31-Balboa, 38AX-Geary "A" Express, and 38BX-Geary "B" Express. The closest MUNI bus stops are at the intersections of California and Baker Streets (1-California), approximately one-half block (500 feet) west of the California Street pedestrian-only school entrance, and at California and Divisadero (1-California and 24--Divisadero), about one and one-half blocks (1,500 feet) from the same school entrance. The 1-California operates every three minutes, at approximately 56 percent of its capacity during the a.m. peak hour and the 24-Divisadero operates every



Source: CHS Consulting Group

2-6-08

Existing Transit Networks and Stop Locations Figure 13

7-8 minutes at about 37 percent capacity in the vicinity of Drew School. The 1BX-California and 38BX-Geary have a stop at the intersection of California and Presidio Avenue, approximately three blocks (3,000 feet) to the west of Drew School. The 31-Balboa has stops near the Divisadero/Pine intersection for westbound and the Divisadero/Bush intersection for eastbound vehicles, approximately one and one-half (1,500 feet) and two and one-half blocks (2,500 feet) to the south, respectively, from the Broderick Street school entrance.

The nearest BART station (Civic Center) is approximately 1.5 miles southeast of the project site on Market Street. It provides a direct connection to the 31-Balboa (three block walk north on Hyde Street to Turk Street). Connecting to the 38-Geary from the Civic Center BART Station would require an eight block walk north on Hyde Street to Geary Street, or exiting BART at the Montgomery Station for a direct connection. Exiting BART at the Embarcadero Station would provide a direct connection to the 1-California. Approximately 24 percent of employees and 27 percent of students of the Drew School travel by transit.[10]

The additional three employees and 37 students would generate approximately nine additional inbound transit trips in the a.m. peak period and nine additional outbound transit trips in the p.m. peak period. These trips would be distributed over the transit lines serving the area. The increase in transit demand associated with the project's twelve percent increase in student population and its nine additional transit trips would not noticeably affect transit services in the area or affect acceptable transit operations. As noted above, the 1-California operates at approximately 56 percent of its capacity during the a.m. peak hour and the 24-Divisadero operates at about 37 percent capacity in the vicinity of Drew School. In view of the above, project impacts on public transit would not be significant.

PARKING

In the RM-1 district, the *Planning Code* parking requirement for secondary schools is one space per two classrooms. The existing Drew School has 29 classrooms and a parking garage with 21 spaces reserved for employees. It also leases 11 parking spaces in a church parking lot on the north side of Pine Street, west of Broderick Street, for its students and employees. With the four additional classrooms of the proposed expansion, the Drew School would have 33 classrooms, for which 17 spaces would be required. The proposed project would not add parking facilities. The existing 21 spaces would comply with the *Code* requirement for parking, and no additional parking spaces would be required as part of the proposed expansion.

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[10] Ibid.

Approximately 65 percent of employees and 37 percent of students of the Drew School travel by auto (excluding students who are dropped off).[11] The additional three employees and 37 students would generate a demand of approximately 16 long-term parking spaces (which can differ from the *Planning Code* parking requirement). It is anticipated that the Drew School's new students and employees would park in the same locations as current students and employees: the Drew School's 21-space parking garage, an off-street church parking lot on the north side of Pine Street west of Broderick Street where 11 spaces are available to Drew School students and employees, and nearby streets. The 16-block area encompassing the project site has 703 on-street parking spaces, of which a survey found that 639 (91 percent) were occupied before 8:15 a.m. and 666 (95 percent) were occupied after 8:15 a.m.[12] While the project would not provide any additional parking spaces, the project-generated parking demand for 16 parking spaces would be less than the approximately 64 available on-street parking spaces in the surrounding 16-block area before 8:15 a.m. In any case, it should be noted that parking shortfalls are not considered significant environmental impacts in the urban context of San Francisco. Unavailability of nearby parking is an inconvenience to drivers, but not a significant physical impact on the environment. In support of the City's "Transit First" policy that emphasizes a shift from personal automobiles to public transit use, priority is given to transit improvements before developing transportation treatments that encourage the continued use of the automobile. Faced with parking shortages or inconvenience, drivers generally seek and find better alternative parking facilities or shift modes of travel (e.g., public transit, taxis, or bicycles). In view of the above discussion, the project would not cause a significant environmental impact. However, encouraging alternative modes of travel and car-sharing would lessen parking impacts (see **Improvement Measure 4, page 80**) and is consistent with the existing Conditional Use authorization conditions.

PEDESTRIAN

California and Pine streets carry a relatively high volume of fast moving traffic. The closest signalized crossing is at the intersection of California Street and Broderick Street to the south. Each signalized intersection has crosswalks, including the intersection of California Street and Broderick Street.

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[11] Ibid.

[12] Ibid.

Pedestrian conditions in the vicinity of the project, on both sidewalks and crosswalks, were observed to be operating at acceptable levels of service. Pedestrian levels in the vicinity of the project, on both sidewalks and crosswalks, were observed to be low to moderate, with pedestrians able to move freely. No sidewalk or capacity-related issues were visible during field observations, but pedestrian-vehicle conflicts were observed during the 30 minutes before school begins and 30 minutes after school ends. Approximately five percent of employees and eight percent of students walk to the Drew School.[13] At these percentages, the additional three employees and 37 students would generate approximately three walk trips in the a.m. and p.m. peak hours. The project is not expected to substantially change the existing pedestrian conditions and would not result in any significant impacts on pedestrian conditions.

BICYCLES

There are four designated Citywide Bicycle Routes in the vicinity of the project site (Route 10–Clay Street; Route 16-Post Street, Route 55-Presidio Street, Route 45–Steiner Street). During a field survey, few bicyclists were observed to be riding in the vicinity of the project site. Bicyclists would approach the school from any direction depending on the origin of their trip. Although the proposed project could result in an increase in the number of vehicles in the vicinity of the project site, this increase would not be substantial enough to affect bicycle travel in the area, and project impacts on bicycles would be less than significant.

There are two bike racks in the school's existing automobile garage with a capacity of 30 bike slots. No bicycle parking spaces would be provided in the proposed school expansion project, and none is required in the *Planning Code*.

LOADING

The number of delivery and service vehicle trips to Drew School is relatively low. Trucks generally use Broderick Street next to the garage to unload. Mail deliveries, such as USPS, UPS, or FedEx, usually use California Street for a brief period. No obvious existing loading conflicts were observed. No off-street loading spaces would be provided in the proposed school expansion project, and none is required in the *Planning Code* for RM-1 districts. The number of additional delivery and service vehicles generated by the proposed 15,604-square-foot school expansion would be relatively low. Adding to the school's existing demand, deliveries would include supplies, classroom materials, and possible stage performance materials, some of which would use standard delivery services like USPS, FedEx or UPS. There would be no change to the number of loading activities of these standard carriers, as new deliveries are expected to be consolidated with present deliveries. Deliveries are currently made without difficulty of conflict at the curb on California Street, where the Drew School has a pedestrian entrance. Any deliveries to the new addition could be made on Broderick Street, the location of the entrance to the Drew School's parking garage as well as a second pedestrian entrance. There would be little if any change from existing conditions where no conflicts have been observed.

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[13] Ibid.

If a parking space is not available to accommodate the loading demand, delivery and service vehicles would likely double-park on California or Broderick Streets. Near the project site, California Street has two travel lanes in each direction, and Broderick has one travel lane in each direction. Through traffic could bypass double-parked delivery and service vehicles. Because traffic on California Street is fast-moving, use of Broderick Street would be a safer place for delivery loading/unloading. However, double parking would not substantially affect traffic flow on either California or Broderick Streets, and would not result in a significant environmental impact.

HAZARDS

As discussed above under Traffic, double-parking, turning movements, and pedestrian street crossings during drop-off and pick-up activities attributable to the building addition would incrementally contribute to, but would not result in new significant safety problems. **Improvement Measure 3, page 79,** would reduce vehicle/vehicle and vehicle/pedestrian conflicts. The proposed project would not include any features that would introduce hazards to the travel environment (e.g. visual distractions). For these reasons, these potential impacts would be considered less-than-significant and will not be discussed in the EIR further.

CONSTRUCTION

The project construction duration is anticipated to be approximately 13 months and there would be a flow of construction-related trucks into and out of the site. Demolition and excavation stages would involve construction truck trips hauling excavated soil and demolished building materials off site. Foundation construction would also involve cement truck trips. Building construction (exterior, interior, finishing), would involve construction material delivery truck trips. All phases would involve construction worker vehicle commute trips. All phases would require construction material storage and equipment staging, especially during the period of concrete pouring The greatest number of construction trucks per day is estimated to be 12 during the first month, declining to four in the second month and ultimately two in the final three months.[14] In months seven and eight at the peak of construction, 40 construction worker vehicles per day are anticipated, varying from 14 vehicles per day in the first month to 24 vehicles per day in the 13th month. The impact of construction truck traffic would be a temporary lessening of the capacities of local streets due to the slower movement and larger turning radii of trucks, which may affect both traffic and transit operations. Pedestrian traffic may be interrupted by construction activities or materials staging. Construction workers who drive to the site would cause a temporary parking demand.

To address the construction impacts discussed in the preceding paragraph, the project sponsor proposes to develop a construction traffic management plan that would include the following topics: construction schedule, construction vehicle staging, construction truck route, size of construction vehicles, materials staging, pedestrian walkways, construction worker parking, construction traffic management, student pick-up and drop-off. The main proposals are discussed below, and the contractor would work with the City's Interdepartmental Staff Committee on Traffic and Transportation (ISCOTT) to finalize the construction traffic management plan.

Construction vehicles would enter the project site from California Street and exit to Pine Street. If an offsite staging area on Pine Street (discussed below) is employed, trucks would turn right to Baker Street, turn right again to California Street, and then turn right onto Broderick Street to enter the project site (see map on page 16 for reference). The size of construction vehicles would be limited to seven cubic yards in order to minimize construction traffic impacts, though on occasion bigger trucks may be required.

The construction contractor would hire a flagman to direct construction vehicle ingress and egress, and barricades and fences would be used to secure the construction site. The construction contractor would schedule the peak construction period, especially foundation and concrete pouring, during the summer when there are no school activities (from the second week of June to the end of August). Concrete pouring would typically take one day, but would require concrete trucks queuing in front of the construction site. Because concrete pouring must be continuous, concrete trucks would require either an offsite staging area or parking space in the vicinity of the construction site. The project sponsor would coordinate with the Traffic Engineering Division of the Department of Parking and Traffic (DPT) and the Police Department to establish areas for offsite concrete truck staging. A potential area would be Pine Street between Divisadero and Baker Streets. Pine Street is a designated Freight Traffic Route, and operates one-way westbound with three traffic lanes and parking on both sides.

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[14] Ibid.

The project sponsor and construction contractor(s) would meet with the DPT and the Police Department to determine feasible traffic mitigation measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project, including relocating the existing white zone from Broderick Street to California Street during the construction period (see **Improvement Measure 5, on page 80**).

There are no Muni bus stops on Broderick Street in front of the project block, and no bus stop relocation would be required. The construction contractor would install a temporary covered pedestrian walkway along the project frontage throughout the entire construction period, to allow continuous pedestrian flow along the west side of Broderick Street.

Construction workers who drive to the site would cause a temporary parking demand. As identified in the Construction Management Plan, the construction contractor would provide offsite parking for the construction workers, so construction workers would not occupy the limited number of on-street parking spaces in Lower Pacific Heights.

The impacts of construction on parking and traffic would be limited in scope and temporary in duration, and would not be significant. However, limiting construction-related truck traffic during peak periods would lessen construction period impacts (see **Improvement Measure 5, on page 80**).

CONCLUSION

The proposed project would expand an existing school facility, and intensify land uses on the project site, but would not have a significant project or cumulative impact on intersection operations, transit demand, pedestrian circulation, bicycles, parking, traffic hazards, construction traffic, or adopted policies, plans, or programs (identified on page 18) supporting alternative transportation. The project site is not located near a public or private airport or within an airport land use plan area and significance criterion 5c would not apply. The proposed project also would not create a significant emergency access impact because the project site would not block streets and the site is accessible from major streets. The proposed project's traffic and circulation impacts would be less than significant under CEQA and implementation of

Improvement Measures 1 through 5 would lessen these impacts. Traffic and circulation will not be discussed in the EIR further.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
6. **NOISE**—Would the project:					
a) Result in exposure of persons to or generation of noise levels in excess of standards established in the local general plan or noise ordinance, or applicable standards of other agencies?	☐	☐	☒	☐	☐
b) Result in exposure of persons to or generation of excessive groundborne vibration or groundborne noise levels?	☐	☐	☒	☐	☐
c) Result in a substantial permanent increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
d) Result in a substantial temporary or periodic increase in ambient noise levels in the project vicinity above levels existing without the project?	☐	☐	☒	☐	☐
e) For a project located within an airport land use plan area, or, where such a plan has not been adopted, in an area within two miles of a public airport or public use airport, would the project expose people residing or working in the area to excessive noise levels?	☐	☐	☐	☐	☒
f) For a project located in the vicinity of a private airstrip, would the project expose people residing or working in the project area to excessive noise levels?	☐	☐	☐	☐	☒
g) Be substantially affected by existing noise levels?	☐	☐	☒	☐	☐

The proposed development would consist of school facilities. In areas with ambient noise levels below 65 decibels, the Environmental Protection Element of the *General Plan* states that construction of schools is "satisfactory, with no special noise insulation requirements," while in areas with ambient noise levels above 65 decibels, "new construction or development should generally not be undertaken."[15] Background noise levels in the project vicinity have been measured at approximately 60 decibels.[16]

The nearest sensitive receptors to the project site would be students and employees of the existing Drew School, nearby residents, and churchgoers to the Seventh-Day Adventist Church (across the street at 2889 California Street).

PROJECT NOISE

Based on published scientific acoustic studies, traffic volumes would need to approximately double to produce a noticeable increase in ambient noise levels in the area. The project's school expansion would generate a small increase in vehicle trips in the project vicinity (see Topic 5. Transportation and Circulation, Traffic, above). This increase in vehicle trips would result in a minimal addition to ambient noise levels and a less-than-significant impact.

The proposed project would likely include new mechanical equipment, such as air conditioning units and chillers, which could produce operational noise. These operations would be subject to Section 2909 of Article 29 (the Noise Ordinance) of the *San Francisco Police Code* that limits noise from building operations. Substantial increases in the ambient noise level due to building equipment noise of the proposed project would not be anticipated. The proposed project would therefore, result in a less-than-significant operational noise impact and the EIR will not discuss this issue.

Existing and project noise levels would therefore not substantially impact students, employees, or visitors at the project, and this issue will not be discussed in the EIR.

CONSTRUCTION NOISE

Excavation and project construction would temporarily and intermittently increase noise and possibly vibration levels around the project site and may be considered an annoyance by occupants of nearby properties. Noise and vibration levels over the estimated 13-month construction period, would fluctuate depending on the construction phase, equipment type and duration of use, distance between noise source and listener, and presence or absence of barriers. Construction noise associated with the proposed project—demolition, excavation, truck traffic, foundation construction, and exterior finish activities—would be noticeable. Of these, demolition, excavation, site work, and erection of the new building's exterior would likely generate the most construction-related noise. Throughout the construction period there would be truck traffic to and from the site, hauling away excavated materials and debris, or delivering building materials. It is anticipated that the construction hours would be normal working hours during the week, with possible limited work during nights or weekends.

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[15] *San Francisco General Plan*, Environmental Protection Element, Land Use Compatibility Chart for Community Noise.

[16] *San Francisco General Plan*, Environmental Protection Element, Map 1, Background Noise Levels, 1974.

The San Francisco Noise Ordinance (Article 29 of the *Police Code*) regulates construction-related noise. Although not listed as a mitigation measure, it is required by law and generally serves to mitigate significant negative impacts of project construction. The ordinance requires that noise levels from individual pieces of construction equipment, other than impact tools, not exceed 80 dBA[17] at a distance of 100 feet from the source. Impact tools, such as jackhammers, must have both the intake and exhaust muffled to the satisfaction of the Director of Public Works. If the noise from the construction work would exceed the ambient noise levels at the property line of the site by five dBA, the work must not be conducted between 8:00 p.m. and 7:00 a.m., unless the Director of DPW authorizes a special permit for conducting the work during that period.

Because of the proximity of the proposed project to nearby sensitive receptors, and because construction would occur concurrent with school operations, additional measures have been identified to reduce impacts to sensitive receptors. Implementation of **Improvement Measure 6, page 80,** which would designate a coordinator to respond to any noise complaints and to coordinate with Drew School administrators as well as the Seventh-Day Adventist Church to limit disruptive noise during church services and school operations, in addition to establishing other noise control measures, would reduce construction noise impacts. **Improvement Measure 5**, proposed under Transportation, above, to minimize the disruption of traffic flow by limiting truck movement to the hours between 9:00 a.m. and 3:30 p.m., would also have the secondary effect of further reducing the construction noise impacts.

The project sponsors anticipate using isolated interior and continuous spread footing foundations. The proposed building expansion would not use pile driving. As a result, the proposed project would not create unusual levels of ground borne vibration that would disturb nearby residents or businesses, and vibration impacts would be less than significant.

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[17] dBA is the symbol for decibels using the A-weighted scale. A decibel is a unit of measurement for sound loudness (amplitude). The A-weighted scale is a logarithmic scale that approximates the sensitivity of the human ear.

The project site is not within an airport land use plan area, nor is it in the vicinity of a private airstrip, and therefore these issues are not discussed further.

Operational noise of the proposed project, including traffic-related noise would not significantly increase the ambient noise levels in the project vicinity. Compliance with the San Francisco Noise Ordinance and Title 24 *California Code* regulations would ensure existing noise levels would not significantly impact project students, employees, or visitors. Construction-related increases in noise and vibration resulting from project construction would not be considered a significant impact because of the temporary and intermittent nature of construction. Nonetheless, **Improvement Measure 6** would reduce temporary construction noise impacts on the conduct of classroom and church activities, and **Improvement Measure 5**, proposed above to reduce construction impacts on transportation and circulation, would have the secondary effect of further reducing construction noise impacts. Therefore, noise impacts of the proposed project would be considered less than significant and will not be discussed further in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
7. AIR QUALITY					
Where available, the significance criteria established by the applicable air quality management or air pollution control district may be relied upon to make the following determinations. Would the project:					
a) Conflict with or obstruct implementation of the applicable air quality plan?	☐	☐	☒	☐	☐
b) Violate any air quality standard or contribute substantially to an existing or projected air quality violation?	☐	☒	☐	☐	☐
c) Result in a cumulatively considerable net increase of any criteria pollutant for which the project region is non-attainment under an applicable federal, state, or regional ambient air quality standard (including releasing emissions which exceed quantitative thresholds for ozone precursors)?	☐	☐	☒	☐	☐
d) Expose sensitive receptors to substantial pollutant concentrations?	☐	☐	☒	☐	☐
e) Create objectionable odors affecting a substantial number of people?	☐	☐	☒	☐	☐

The Federal Clean Air Act (CAA), as amended, and the California Clean Air Act (CCAA) legislate ambient air standards and related air quality reporting systems for regional regulatory agencies to then develop mobile and stationary source control measures to meet the standards. The Bay Area Air Quality Management District (BAAQMD) is the primary responsible regulatory agency in the Bay Area for planning, implementing, and enforcing the federal and state ambient standards for criteria pollutants.[18] Criteria air pollutants include ozone, carbon monoxide (CO), nitrogen dioxide (NO_2), sulfur dioxide (SO_2), particulate matter (PM_{10} and $PM_{2.5}$), and lead.

The San Francisco Bay Area Air Basin encompasses many counties including San Francisco, Alameda, Contra Costa, Marin, San Mateo, Napa and parts of Solano and Sonoma counties. The San Francisco Air Basin has a history of air quality violations for ozone, carbon monoxide, and particulate matter. The basin currently does not meet the State ambient air quality standards for ozone, PM_{10}, and $PM_{2.5}$. BAAQMD has adopted air quality management plans over the years to address control methods and strategies to meet air quality standards, the latest plans being the *Bay Area 2000 Clean Air Plan, 2001 Ozone Attainment Plan,* and *2005 Bay Area Ozone Strategy.*

OPERATION EMISSIONS

According to the BAAQMD, vehicles are the primary source of operational project-related emissions.[19] The proposed project would affect local air quality by increasing vehicular traffic on nearby roads and at the project site, and by adding stationary emissions (mechanical equipment) to the project site. The BAAQMD has established thresholds of significance for project operations, listed in Table 1 page 45.

The BAAQMD has also established thresholds for which projects require review for potential air quality impacts.[20] These thresholds are based on the minimum size projects that the BAAQMD considers capable of producing air quality problems due to vehicular emissions. The BAAQMD generally does not recommend a detailed air quality analysis for projects that would generate fewer than 2,000 vehicle trips per day. The proposed project's approximately 15,604-square-foot expansion of the existing Drew School would be expected to generate well below 2,000 daily vehicle trips. Therefore, the proposed project would not exceed the BAAQMD thresholds.

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[18] State and Federal air quality standards and the Bay Area's attainment status can be viewed on the BAAQMD website at http://www.baaqmd.gov.

[19] Bay Area Air Quality Management District, *BAAQMD CEQA Guidelines, Assessing the Air Quality Impacts of Projects and Plans*, December 1999.

[20] Ibid, page 25.

Table 1
Pollutant Thresholds of Significance for Project Operations

Pollutant	ton/year	pound/day	kilogram/day
ROG[1]	15	80	36
NOx[2]	15	80	36
PM_{10}[3]	15	80	36

Notes:

[1] Reactive organic gases
[2] Nitrous oxide
[3] Particulate matter with a diameter of less than 10 microns

Source: BAAQMD CEQA Guidelines, December 1999.

Additional stationary source emissions, generated by mechanical equipment, and the combustion of natural gas for building space and water heating would be relatively minimal, and would therefore be considered less than significant. The proposed project would not violate any BAAQMD ambient air quality standard or contribute substantially to an existing or projected air quality violation. For all of the above reasons, the proposed project would not generate significant operational air quality impacts.

The *BAAQMD CEQA Guidelines* indicate that for any project that does not individually have significant operational air quality impacts, the determination of whether it has a significant cumulative impact should be based on whether it is consistent with the *General Plan*. The proposed project, with its minor vehicle traffic and therefore pollutant contribution, would be generally consistent with the *General Plan* and, as such, air quality management plans such as the *Bay Area 2000 Clean Air Plan*, and the *Bay Area 2005 Ozone Strategy*. Additionally, the *General Plan*, the *Planning Code*, and the City Charter implement various transportation control measures identified in the *2005 Ozone Strategy* through the City's Transit First Program, bicycle parking requirements, transit development fees, and other actions. Accordingly, the proposed project would not contribute considerably to cumulative air quality impacts, nor would it interfere with implementation of the *2005 Ozone Strategy* or the *2001 Ozone Attainment Plan*, which are the applicable regional air quality plans developed to improve air quality towards attaining the state and federal ambient air quality standards. As such the operational characteristics of the proposed project would not result in cumulatively considerable increases in regional air pollutants.

"Greenhouse Gas" Emissions

Gases that trap heat in the atmosphere are often called greenhouse gases (GHGs). Both natural processes and human activities emit GHGs. The accumulation of GHGs in the atmosphere regulates the earth's temperature; however, emissions from human activities such as electricity production and vehicles have elevated the concentration of these gases in the atmosphere. This accumulation of GHGs has contributed to an increase in the temperature of the earth's atmosphere and contributed to climate change. The principal greenhouse gases are carbon dioxide, methane, nitrous oxide, ozone, and water vapor. Carbon dioxide is the "reference gas" for climate change, meaning that emissions of GHGs are typically reported in "carbon dioxide equivalent" measures.[7]

Of the principal gases, carbon dioxide (CO2) and methane are emitted in the greatest quantities from human activities. Emissions of carbon dioxide are largely by-products of fossil fuel combustion, whereas methane results from off-gassing associated with agricultural practices and landfills. Other GHGs—with much greater heat-absorption potential than CO2—include hydrofluorocarbons, perfluorocarbons, and sulfur hexafluoride, and are generated in certain industrial processes. There is international scientific consensus that human-caused increases in GHGs has and will continue to contribute to global warming, although there is much uncertainty concerning the magnitude and rate of the warming.

The California Energy Commission estimated that in 2004 California produced 500 million gross metric tons (about 550 million U.S. tons) of CO2-equivalent GHG emissions. The CEC found that transportation is the source of 38 percent of the State's GHG emissions, followed by electricity generation (both in-state and out-of-state) at 23 percent and industrial sources at 13 percent.[8]

In the Bay Area, fossil fuel consumption in the transportation sector (on-road motor vehicles, off-highway mobile sources, and aircraft) is the single largest source of the Bay Area's GHG emissions, accounting for just over half of the Bay Area's 85 million tons of GHG emissions in 2002. Industrial and commercial sources were the second largest contributors of GHG emissions with about one-fourth of total emissions. Domestic sources (e.g., home water heaters, furnaces, etc.) account for about 11 percent of the Bay Area's GHG emissions, followed by power plants at seven percent. Oil refining currently accounts for approximately six percent of the total Bay Area GHG emissions.[9]

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[7] Because of the differential heat absorption potential of various GHGs, GHG emissions are frequently measured in "carbon dioxide-equivalents," which present a weighted average based on each gas's heat absorption (or "global warming") potential.

[8] California Energy Commission, Inventory of California Greenhouse Gas Emissions and Sinks: 1990 to 2004 -Final Staff Report, publication # CEC-600-2006-013-SF, December 22, 2006; and January 23, 2007 update to that report. Available on the internet at: http://www.arb.ca.gov/cc/ccei/emsinv/emsinv.htm.

In 2005, in recognition of California's vulnerability to the effects of climate change, Governor Schwarzenegger established Executive Order S-3-05, which sets forth a series of target dates by which statewide emissions of GHG would be progressively reduced, as follows: by 2010, reduce GHG emissions to 2000 levels; by 2020, reduce GHG emissions to 1990 levels; and by 2050, reduce GHG emissions to 80 percent below 1990 levels.

In 2006, California passed the California Global Warming Solutions Act of 2006 (Assembly Bill No. 32; California Health and Safety Code Division 25.5, Sections 38500, et seq., or AB 32), which requires the ARB to design and implement emission limits, regulations, and other measures, such that feasible and cost-effective statewide GHG emissions are reduced to 1990 levels by 2020 (representing a 25 percent reduction in emissions).

In February 2002, the San Francisco Board of Supervisors passed the Greenhouse Gas Emissions Reduction Resolution, committing the City and County of San Francisco to a GHG emissions reductions goal of 20 percent below 1990 levels by the year 2012. In September 2004, the San Francisco Department of the Environment and the San Francisco Public Utilities Commission published the Climate Action Plan for San Francisco: Local Actions to Reduce Greenhouse Emissions (Plan).[10] Although the Board of Supervisors has not formally committed the City to perform the actions addressed in the Plan, and many of the actions require further development and commitment of resources, it serves as a blueprint for GHG emission reductions.

Implementation of the proposed Drew School Addition would contribute to long-term increases in GHGs as a result of traffic increases (mobile sources) and residential and commercial building heating (area sources), as well as indirectly, through electricity generation. Direct project emissions of carbon dioxide, the primary greenhouse gas that would be emitted, would be an estimated 132 tons per year from mobile sources (vehicular travel) and 33 tons per year from area sources (almost entirely natural gas combustion for heating, assuming a conventional gas-fired system), for a total of 165 tons per year,[11] or approximately two ten thousandths of a percent of the 85-million-ton total Bay Area GHG emissions for the year 2002.

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[9] BAAQMD, Source Inventory of Bay Area Greenhouse Gas Emissions: Base Year 2002, November 2006. Available on the internet at: http://www.baaqmd.gov/pln/ghg_emission_inventory.pdf.

[10] San Francisco Department of the Environment and San Francisco Public Utilities Commission, Climate Action Plan for San Francisco, Local Actions to Reduce Greenhouse Emissions, September 2004.

The project's incremental increases in GHG emissions associated with traffic increases and space heating would contribute to regional and global increases in GHG emissions and associated climate change effects. Neither the BAAQMD nor any other agency has adopted significance criteria or methodologies for estimating a project's contribution of GHGs or evaluating its significance. However, no individual development project, such as the proposed Drew School Addition could, by itself, generate sufficient emissions of GHGs to result in a significant impact in the context of the cumulative effects of GHG emissions such that it would impair the state's ability to implement AB32.

As the project would be developed in an urban area with good transit access, the project's transportation-related GHG emissions would tend to be less relative to the same amount of population and employment growth elsewhere in the Bay Area, where transit service is generally less available than in the central city of San Francisco. As new construction, the residential portion of the proposed project would be required to meet California Energy Efficiency Standards for Residential and Nonresidential Buildings, helping to reduce future energy demand as well as reduce the project's contribution to cumulative regional GHG emissions. Any conclusion regarding the effect of the project's incremental contribution to cumulative GHG emissions levels is speculative, and therefore no determination of significance can be made at this time.

For the reasons discussed above, the proposed project would not be considered to have a significant impact on cumulative greenhouse gas in the Bay Area.

ODORS

According to the BAAQMD, typical operational uses that may result in significant odor impacts include wastewater treatment plants, landfills, asphalt batch plants, chemical manufacturing, painting/coating operations, and coffee roasters. The proposed project would not increase or change perceptibly odors on the project site or in the vicinity of the proposed project, as it would not include uses with objectionable odors. Observation indicates that surrounding land uses are not sources of objectionable odors that would adversely affect project students, employees, or visitors. Therefore, creation of objectionable odors would not be an impact of the proposed project.

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[11] Don Ballanti, Certified Consulting Meteorologist, *Urembis 2007 Combined Annual Emissions Reports (Tons/Year)* for the proposed Drew School Addition project, March 3, 2008. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

CONSTRUCTION EMISSIONS

Site preparation activities, such as demolition, excavation, grading, foundation construction, and other ground-disturbing construction activity would temporarily affect localized air quality during the construction phases for the proposed project causing temporary and intermittent increases in particulate dust and other pollutants. The movement of heavy equipment would create fugitive dust (particulate matter including PM_{10} and $PM_{2.5}$) and diesel fuel combustion would emit nitrogen oxides (NOx), carbon monoxide (CO), sulphur dioxide (SO_2), reactive organic gases or hydrocarbons (ROG or HC), and particulate matter with a diameter of less than 10 microns (PM_{10}).

While construction emissions would occur in short-term, temporary phases, they could cause adverse effects on local air quality. Demolition and soil movement for foundation excavation lasting approximately one month would create the potential for wind-blown dust to add to the particulate matter in the local atmosphere during demolition activities and while open soil would be exposed. Although more of a nuisance than a health hazard to most people, the dust could affect persons with respiratory diseases immediately downwind of the site, as well as any sensitive electronics or communications equipment. Seniors, children or other potentially sensitive receptors near the proposed project may be exposed to some limited airborne dust associated with the project demolition and ground-disturbance activities. The BAAQMD, in its *CEQA Guidelines*, has identified a set of PM_{10} and $PM_{2.5}$ control measures for construction activities such as twice daily watering of exposed soil areas, daily sweeping of surrounding streets, covering of construction vehicle loads, and on-going construction truck maintenance to minimize exhaust emissions. In order to reduce the quantity of dust generated during site preparation and construction, the project sponsor has agreed to implement **Mitigation Measure 2**, which lists BAAQMD PM_{10} control measures for sensitive receptors (see Section F. Mitigation Measures and Improvement Measures, page 78). With the implementation of **Mitigation Measure 2**, construction-related air quality impacts of the proposed project would be reduced to a less-than-significant level.

CONCLUSION

As discussed above, the proposed project would not conflict with applicable air quality plans, would not create significant operational or cumulative air emissions, would not have an impact on greenhouse gases, and would not create objectionable odors. With the implementation of **Mitigation Measure 2, page 77**, the proposed project's construction-related air quality impacts would be reduced to a less-than-significant level.

The EIR will therefore not include discussion relating to other air quality issues.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
8. WIND AND SHADOW—Would the project:					
a) Alter wind in a manner that substantially affects public areas?	☐	☐	☒	☐	☐
b) Create new shadow in a manner that substantially affects outdoor recreation facilities or other public areas?	☐	☐	☒	☐	☐

WIND

The Drew School project site is the northwest corner of the block bounded by California, Broderick, Pine, and Baker Streets (see Figures 1 and 2, pages 2 and 3). Directly west of the existing Drew School courtyard are some mature trees in the rear yards of residences on the project block. A parking lot extending northward from Pine Street backs up to the southwest corner of the project site. The project block is framed by rows of contiguous residential buildings, mostly three stories in height, along the south side of California Street, the north side of Pine Street, and the east side of Baker Street. These buildings, and the upwardly sloping terrain to the west, partially shelter the site from prevailing winds, including westerly winds. The proposed three-story-over-basement, 40-foot-tall addition would demolish the existing three-story residential building on Lot 3, and replace it with a building of approximately the same height, which would also be the same height as the existing three-story residential buildings to the south and the existing Drew School building to the north, and would be one story taller than the majority of buildings to the west.

The proposed project includes a roof area that could be used for outdoor education space; which would be at roughly the same height as the existing building's roof (see Figure 10, page 11). Exposure to westerly winds would not be expected to be substantially different from neighboring roof decks. As the proposed project would be roughly the same height as the existing structure on site as well as neighboring structures, the proposed project is not anticipated to increase wind exposure over existing conditions.

SHADOW

Planning Code Section 295 was adopted in 1984 pursuant to voter approval of Proposition K, to prohibit new shadow on designated parks in the city during the period between one hour after sunrise and one hour before sunset, year round. Section 295 generally prohibits the construction of structures over 40 feet in height that would cause new shadow on any open space under the jurisdiction of or designated to be acquired by the Recreation and Park Commission, unless the Planning Commission, in consultation with the General Manager of the Recreation and Park Department, determines that the shade would not have a significant impact on the use of such property. At 40 feet in height, the proposed project would not be subject to the provisions of Section 295.

The proposed project would replace an existing three-story building with another structure of roughly the same height but with a larger floorplate. It would create new shadow on the courtyard within the project site. The new building could create some new morning shadow on the back yards and rear windows of properties west of the project site (2909 – 2913 California Street), although the effect would be limited by the orientation of the new structure to the sun and the shade of existing trees on those lots. The project's proposed enclosure of the courtyard onsite would create some new afternoon shade on the public sidewalks along Broderick Street The proposed project would not increase the total amount of shading in the neighborhood above levels which are common and generally accepted in urban areas.

For the reasons above, the proposed project would not be considered to have a significant effect on shadows. Therefore, the EIR will not include a discussion relating to shadow issues.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
9. **RECREATION**—Would the project:					
a) Increase the use of existing neighborhood and	☐	☐	☒	☐	☐

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
regional parks or other recreational facilities such that substantial physical deterioration of the facilities would occur or be accelerated?					
b) Include recreational facilities or require the construction or expansion of recreational facilities that might have an adverse physical effect on the environment?	☐	☐	☐	☐	☒
c) Physically degrade existing recreational resources?	☐	☐	☒	☐	☐

The proposed project would result in net daily increase of 34 people on a site, which could increase demand for and use of recreation facilities in the immediate four-block vicinity of the project site. Such facilities include Alta Plaza Park, located approximately four blocks northeast of the project site in the area bounded by Scott, Steiner, Clay, and Jackson Streets; Clay Street Mini-Park, located approximately four blocks northwest of the project site on the south side of Clay Street between Baker and Lyon Streets; Presidio Library Mini-Park, located approximately three blocks northwest of the project site on the north side of Sacramento Street between Baker and Lyon Streets; and Bush and Broderick Mini-Park, located approximately two blocks southwest of the project site on the south side of Bush Street between Broderick and Baker Streets.

During school hours, the students take their breaks on the school premises. The proposed project's increase in students and employees would not be considered a substantial contribution to the existing demand for public recreational facilities in this area and would not result in substantial physical deterioration of existing recreational resources. The proposed project would not require the construction or expansion of offsite recreational facilities that might have an adverse physical effect on the environment. Therefore, the proposed project would have a less than significant impact with regard to recreation and this topic will not be discussed further in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
10. UTILITIES AND SERVICE SYSTEMS— Would the project:					
a) Exceed wastewater treatment requirements of the applicable Regional Water Quality Control	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
Board?					
b) Require or result in the construction of new water or wastewater treatment facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
c) Require or result in the construction of new storm water drainage facilities or expansion of existing facilities, the construction of which could cause significant environmental effects?	☐	☐	☒	☐	☐
d) Have sufficient water supply available to serve the project from existing entitlements and resources, or require new or expanded water supply resources or entitlements?	☐	☐	☒	☐	☐
e) Result in a determination by the wastewater treatment provider that would serve the project that it has inadequate capacity to serve the project's projected demand in addition to the provider's existing commitments?	☐	☐	☒	☐	☐
f) Be served by a landfill with sufficient permitted capacity to accommodate the project's solid waste disposal needs?	☐	☐	☒	☐	☐
g) Comply with federal, state, and local statutes and regulations related to solid waste?	☐	☐	☒	☐	☐

The project site is within an urban area that is served by utility service systems, including water, wastewater and storm water collection and treatment, and solid waste collection and disposal. The proposed educational building expansion would increase demand for and use of such utilities and services, but not in excess of amounts expected and provided for in this area.

SEWER AND WASTEWATER SERVICE

The project site is served by San Francisco's combined sewer system, which handles both sewage and stormwater runoff. The Southeast Water Pollution Control Plant (Southeast Plant) provides wastewater and stormwater treatment and management for the east side of the city, including the project site. No major new sewer or stormwater facilities or construction would be needed to serve the proposed project. The proposed project would meet the wastewater pre-treatment requirements of the San Francisco Public Utilities Commission, as required by the San Francisco Industrial Waste Ordinance in order to meet

Regional Water Quality Control Board requirements.[21] The project's 37 additional students and three employees would generate approximately 2,480 gallons of wastewater per day.[22] Since the project site is virtually completely covered with impervious surfaces, construction of the proposed project would not substantially increase the amount of stormwater runoff from the site. Additionally, as part of LEED certification, the project sponsor would investigate the possibility of both the capture and reuse of stormwater for irrigation and possibly for toilet flushing as well as irrigation recovery, storage and reuse systems, which would reduce stormwater runoff.

In San Francisco, stormwater runoff (as opposed to wastewater) contributes greatly to the total volume discharged through the combined sewer system. The 2,480 gallons of wastewater generated by the proposed project would represent a small increment of the total flow. The proposed project would not substantially increase the demand for wastewater treatment and would therefore result in a less-than-significant wastewater service impact. This topic will not be discussed further in the EIR.

WATER SUPPLY FACILITIES

The proposed project, with an additional 37 students and three employees, would consume up to an estimated 2,046 gallons of water per day.[23] The three-unit residential building on the site currently consumes an estimated 372 gallons of water per day. Although the proposed project would incrementally increase the demand for water in San Francisco, the estimated increase in demand could be accommodated within anticipated water use and supply for San Francisco.[24]

The new construction would be designed to incorporate water-conserving measures, such as low-flush toilets and urinals, as required by the *California State Building Code* Section 402.0(c). As discussed under

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[21] City and County of San Francisco, Ordinance No. 19-92. *San Francisco Municipal Code* (Public Works), Part II, Chapter X, Article 4.1 (amended), January 13, 1992.

[22] The wastewater estimate for the proposed project is 62 gallons x 40 additional users or 2,480 gallons per day. The estimate of 62 gallons per capita per day of wastewater is based on residential water consumption estimates, which are consistent with water use assumptions incorporated within the San Francisco Public Utility Commission's Year 2000 Urban Water Management Plan.

[23] Based on current residential use in San Francisco of 62 gallons per capita per day (gpcd) (SFPUC, *2005 Urban Water Management Plan for the City and County of San Francisco (UWMP)*, December 2005, pages 40 and 41, available online at http://sfwater.org/detail.cfm/MC_ID/7/MSC_ID/106/ MTO_ID/NULL/C_ID/2776). The 33 students and employees would consume approximately 2,046 gallons of water per day.

[24] San Francisco Public Utility Commission, *2005 UWMP*. The *2005 UWMP* uses the San Francisco Planning Department's current long range growth projections – *Land Use Allocation 2002* – an estimate of total growth expected in the City and County of San Francisco from 2000 – 2025. These projections have similar employment growth and approximately 15,000 higher household growth than ABAG Projections 2002.

Topic 7. Air Quality, during project construction, the project sponsor and project building contractor must comply with Ordinance 175-91, passed by the Board of Supervisors on May 6, 1991, which requires that non-potable water be used for dust control activities. As noted above, the project sponsor would investigate the possibility of both the capture and reuse of stormwater for irrigation and other uses. The project sponsor would also work with DBI plumbing engineers for potential incorporation of grey water to minimize potable water use to the maximum extent possible. Since the proposed project's water demand could be accommodated by the existing and planned supply anticipated under the San Francisco Public Utility Commission's *2005 UWMP* and would use best-practice water conservation devices, it would not result in a substantial increase in water use and could be served from the existing water supply entitlements and resources. Therefore, the proposed project would result in less-than-significant project-specific and cumulative water impacts and this topic will not be further discussed in the EIR.

SOLID WASTE

Solid waste would be collected by Sunset Scavenger Company, hauled to the Norcal transfer station near Candlestick Point, and recycled as feasible, with non-recyclables being disposed of at the Altamont Landfill, where it is required to meet federal, state, and local solid waste regulations. A substantial expansion of the Altamont Landfill, approved in 1997 and under construction will accommodate San Francisco's solid waste stream well into the future. Additionally, the City has a goal to divert most (75 percent) of its waste away from disposal (through recycling, composting, etc.) by 2010 and to divert all waste by 2020. Drew School has an existing infrastructure for occupant composting and recycling for their facilities. As mandated by local requirements, a construction waste management plan will reduce the amount of construction and demolition waste going to landfill by at least 75 percent. The solid waste that would be generated by project construction and operation would not substantially affect the projected life of the Altamont Landfill. Therefore, the proposed project would result in less-than-significant project-specific and cumulative solid waste impact, and will not be further discussed in the EIR.

CONCLUSION

No new water delivery or wastewater collection and treatment facilities would be required to serve the proposed project. The proposed project's solid waste would be recycled as feasible at the Norcal transfer station, with non-recyclables disposed of at the Altamont Landfill, where adequate capacity exists to serve existing and future needs of San Francisco. The proposed project would incrementally increase the demand for water, wastewater, and other utilities onsite, but not in excess of anticipated demand projected for the City of San Francisco. Therefore, the proposed project would result in a less-than-significant utilities and service systems impact and this topic will not be further discussed in the EIR.

Topics	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
11. PUBLIC SERVICES—Would the project:					
a) Result in substantial adverse physical impacts associated with the provision of, or the need for, new or physically altered governmental facilities, the construction of which could cause significant environmental impacts, in order to maintain acceptable service ratios, response times, or other performance objectives for any public services such as fire protection, police protection, schools, parks, or other services?	☐	☐	☒	☐	☐

POLICE AND FIRE PROTECTION

The project site receives police and fire protection services from the San Francisco Police Department and the San Francisco Fire Department, respectively. The proposed addition of approximately 37 students and three employees could incrementally increase the demand for fire and police services to the project site. Police protection is provided by the Richmond Station located at 461 Sixth Avenue, approximately 1.3 miles away. Although the proposed project could increase the number of calls received from the area as a result of the increased concentration of activity on site, the increase would not likely be substantial in light of the existing demand for police protection services in the Lower Pacific Heights area.

The nearest fire station is Station 10, located approximately four blocks away at 655 Presidio Avenue. The proposed addition would be required to comply with the current *Building Code*'s fire safety and fire prevention standards. The increase in demand for fire protection services resulting from the proposed school expansion would not be substantially greater than existing demand for fire protection services in the project area. Meeting the additional demand for police and fire services would not require the construction of new police or fire prevention facilities. The proposed project would therefore, not result in a significant environmental impact and the EIR will not discuss police or fire protection services further.

SCHOOLS

The nearest public elementary schools are the Dr. William L. Cobb Elementary School at 2725 California Street, approximately two blocks east of the site, and the Rosa Parks/Japanese Bilingual-Bicultural Program West at 1501 O'Farrell Street, approximately 0.75 mile southeast of the site. The nearest middle school is the Roosevelt Middle School at 460 Arguello Boulevard, approximately one mile west of the site, and the nearest high school is Ida B. Wells High School at 1099 Hayes Street, approximately one mile southeast of the site. The employment of approximately three additional faculty/administrative staff and their potential children could increase demand at nearby schools, although this demand would not be significant, given existing demand and capacity in existing San Francisco Unified School District schools For this reason, the proposed project would not have a substantial impact on school facilities, and the EIR will not discuss school-related impacts further.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
12. **BIOLOGICAL RESOURCES**— Would the project:					
a) Have a substantial adverse effect, either directly or through habitat modifications, on any species identified as a candidate, sensitive, or special-status species in local or regional plans, policies, or regulations, or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
b) Have a substantial adverse effect on any riparian habitat or other sensitive natural community identified in local or regional plans, policies, regulations or by the California Department of Fish and Game or U.S. Fish and Wildlife Service?	☐	☐	☐	☒	☐
c) Have a substantial adverse effect on federally protected wetlands as defined by Section 404 of the Clean Water Act (including, but not limited to, marsh, vernal pool, coastal, etc.) through direct removal, filling, hydrological interruption, or other means?	☐	☐	☐	☐	☒
d) Interfere substantially with the movement of any native resident or migratory fish or wildlife species or with established native resident or migratory wildlife corridors, or impede the use of native wildlife nursery sites?	☐	☐	☐	☒	☐

Topics:		*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
e)	Conflict with any local policies or ordinances protecting biological resources, such as a tree preservation policy or ordinance?	☐	☐	☐	☒	☐
f)	Conflict with the provisions of an adopted Habitat Conservation Plan, Natural Community Conservation Plan, or other approved local, regional, or state habitat conservation plan?	☐	☐	☐	☐	☒

The proposed project would replace one three-story structure with another of similar size, utilizing a green wall and roof. The project site is currently virtually completely covered by impervious surfaces, and is within a developed area located within an urban setting. The site, therefore, does not provide habitat for any rare or endangered plant or animal species and the proposed project would not affect or substantially diminish plant or animal habitats, including riparian or wetland habitat. The proposed green wall and roof would add vegetation to the project site and possibly attract birds and insects. The proposed project would not interfere with any resident or migratory species, or affect any rare, threatened, or endangered species. There are no adopted habitat conservation plans applicable to the project site.

One or more of the three street trees along the Broderick Street frontage would be removed to facilitate construction and would be replaced. The two street trees along the California Street frontage would be retained. Four evergreen elm trees in the courtyard level of the school and thirteen white poplar trees at the edge of the courtyard would be removed and no additional landscaping is planned. The San Francisco Board of Supervisors recently adopted legislation that amended the City's Urban Forestry Ordinance, *Public Works Code* Sections 801 et. seq., to require a permit from the DPW to remove any protected trees. Protected trees include landmark trees, significant trees, or street trees located on private or public property anywhere within the territorial limits of the City and County of San Francisco. None of the trees that would be removed and replaced is landmark trees or significant trees (with a canopy in excess of 15 feet or a trunk diameter in excess of 12 inches). Based on the above, the proposed project would have no significant impact on biological resources, and the EIR will not analyze this issue further.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
13. GEOLOGY AND SOILS— Would the project:					
a) Expose people or structures to potential substantial adverse effects, including the risk of loss, injury, or death involving:					
i) Rupture of a known earthquake fault, as delineated on the most recent Alquist-Priolo Earthquake Fault Zoning Map issued by the State Geologist for the area or based on other substantial evidence of a known fault? (Refer to Division of Mines and Geology Special Publication 42.)	☐	☐	☐	☒	☐
ii) Strong seismic ground shaking?	☐	☐	☒	☐	☐
iii) Seismic-related ground failure, including liquefaction?	☐	☐	☒	☐	☐
iv) Landslides?	☐	☐	☐	☒	☐
b) Result in substantial soil erosion or the loss of topsoil?	☐	☐	☒	☐	☐
c) Be located on geologic unit or soil that is unstable, or that would become unstable as a result of the project, and potentially result in on- or offsite landslide, lateral spreading, subsidence, liquefaction, or collapse?	☐	☐	☒	☐	☐
d) Be located on expansive soil, as defined in Table 18-1-B of the *Uniform Building Code,* creating substantial risks to life or property?	☐	☐	☒	☐	☐
e) Have soils incapable of adequately supporting the use of septic tanks or alternative wastewater disposal systems where sewers are not available for the disposal of wastewater?	☐	☐	☐	☐	☒
f) Change substantially the topography or any unique geologic or physical features of the site?	☐	☐	☐	☒	☐

The San Francisco *General Plan* Community Safety Element contains maps that show areas of the city subject to geologic hazards. The project site is located in an area subject to "strong" groundshaking (Modified Mercalli Intensity VII) from earthquakes along the Peninsula segment of the San Andreas Fault and the Hayward Fault (Maps 2 and 3 of the Community Safety Element).[12] The project site is not within a high seismic hazard zone for liquefaction of seismically induced landslides, as shown on the official State of California Seismic Hazards Zone Map for San Francisco prepared under the Seismic Hazards Mapping Act of 1990.[13] The project site is not within an area subject to landslide (Map 5 of the Community Safety Element). The project site is not in an area subject to tsunami run-up, or reservoir inundation hazards (Maps 6 and 7 of the Community Safety Element).

The project site is not within an Earthquake Fault Zone as defined by the Alquist-Priolo Earthquake Fault Zoning Act and no known fault or potentially active fault exists on the site. Therefore, the risk of surface faulting is considered to be low. However, in a seismically active area, such as the San Francisco Bay area, the possibility exists for future faulting in areas where no faults previously existed. Furthermore, during an earthquake along any of the major faults mentioned above, the ground at the project site would experience strong to very strong shaking. Strong shaking during an earthquake can result in ground failure associated with soil liquefaction, lateral spreading, and differential compaction (also referred to as cyclic densification).

The project site slopes gently to the south, at an approximately five percent grade. The residential building occupies the entire southern portion of the project site, except for an approximately three feet rear yard along the western boundary of the property. The northern portion of the project site is occupied by the existing Drew School.

Based on the geotechnical report prepared for the project, a thin layer of sandy fill (probably less than two feet) may blanket the site.[25] The sandy fill is loose and contains fines; it was most likely placed by end dumping as part of the leveling process to develop residential lots in the area. Above this, fill material from the existing school site was placed beneath the existing podium (courtyard). This fill, which consists of dune and clayey sand, was placed as part of the construction of the existing Drew School to minimize soil off-haul from the site during construction. This material is not compacted. The fill is underlain by three to 6.5 feet of fine-grained dune sand, which is loose and may compress under moderate loadings. The dune sand is underlain by medium-dense to very dense clayey sand and sand with clay to the maximum depth explored during test borings in 1999 (Elevation 141.5 feet). Laboratory tests indicate these materials are strong and relatively incompressible under moderate loads. On the basis of known subsurface conditions in the site vicinity, the geotechnical report concluded that bedrock exists approximately 60 feet below the sidewalk grade, consisting of moderately to deeply weathered sandstone of the Franciscan Complex. Groundwater was encountered during the 1999 test borings at depths of 23 to 30 feet. The depth to the free groundwater may fluctuate with the seasons.

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[12] Continued research has resulted in revisions to ABAG's earthquake hazard maps. Available on the ABAG website (viewed March 2, 2008) at: http://www.abag.ca.gov/bayarea/eqmaps/mapsba.html. Based on the 1995 ABAG report, an earthquake on these faults could result in "moderate" and "nonstructural" damage, respectively, in the project vicinity. However, ABAG notes, "The damage, however, will not be uniform. Some buildings will experience substantially more damage than this overall level, and others will experience substantially less damage." For this reason, aBAG currently produces Shaking Hazard Maps that depict intensity of groundshaking, rather than estimated damage.

[13] The Seismic Hazards Mapping Act was developed to protect the public from the effects of strong ground shaking, liquefaction, landslides, or other ground failure, and from other hazards caused by earthquakes. This act requires the State Geologist to delineate various seismic hazard zones and requires cities, counties, and other local permitting agencies to regulate certain development projects within these areas.

[25] Treadwell & Rollo, op cit.

Approximately 29,000 cubic feet of soil would be removed during excavation for the proposed project.[14] The geotechnical analysis completed for the proposed project indicated that temporary shoring of adjacent properties would be conducted during excavation, and recommended a soldier pile and lagging system. The report noted that underpinning of the adjacent buildings may be required, and recommended spread footings be used. The analysis also made additional recommendations for site preparation and fill placement, basement floor design, wall strength that would withstand lateral pressure, seismic design, shoring design, and other geotechnical aspects of the proposed project. The geotechnical analysis found the site suitable for development provided that geotechnical recommendations were incorporated into the design and construction of the proposed project. The project sponsor has agreed to follow the recommendations of the current and any updated geotechnical report in constructing the proposed project.

Strong ground shaking can cause unsaturated sand above the groundwater table to densify and settle. At the project site, the approximately four feet of loose to medium dense sand would be removed as part of the project. Beneath the streets and sidewalks, where the sand would remain, the geotechnical consultant concluded that earthquake-induced settlement of the fill and native sand could be approximately one inch.

The final building plans would be reviewed by the Department of Building Inspection (DBI). In reviewing building plans, DBI refers to a variety of information sources to determine existing hazards and assess requirements for mitigation. Sources reviewed include maps of Special Geologic Study Areas and known landslide areas in San Francisco as well as the building inspectors' working knowledge of areas of special geologic concern. The above referenced geotechnical investigation would submitted to the DBI during its review of building permits for the site. Also, DBI could require preparation of additional site-specific soils report(s) in conjunction with permit applications, if needed. As noted above, the project sponsor has agreed to follow the recommendations of the current and any updated geotechnical report in constructing the proposed project.

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[14] Alice Suet Yee Barkley/Denis F. Shanagher, op cit.

Additionally, the project would be constructed to meet the current seismic engineering standards of the State *Building Code for Schools* that is prescribed by the Field Act which contain more stringent seismic safety requirements than the *San Francisco Building Code*. The project would provide maximum feasible protection for the students, faculty and support staff. While the project would expose more persons than at present to earthquake hazards in the project area, it would comply with current seismic and life safety requirements.

The proposed project would not substantially change the topography of the site or any unique geologic or physical features of the site.

For all of the above reasons, the proposed project would not result in significant impacts related to geology, topography, or seismic or soil hazards, either individually or cumulatively. The EIR will not further discuss these topics.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporation*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
14. HYDROLOGY AND WATER QUALITY— Would the project:					
a) Violate any water quality standards or waste discharge requirements?	☐	☐	☒	☐	☐
b) Substantially deplete groundwater supplies or interfere substantially with groundwater recharge such that there would be a net deficit in aquifer volume or a lowering of the local groundwater table level (e.g., the production rate of pre-existing nearby wells would drop to a level which would not support existing land uses or planned uses for which permits have been granted)?	☐	☐	☒	☐	☐
c) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river,	☐	☐	☒	☐	☐

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
in a manner that would result in substantial erosion of siltation on- or offsite?					
d) Substantially alter the existing drainage pattern of the site or area, including through the alteration of the course of a stream or river, or substantially increase the rate or amount of surface runoff in a manner that would result in flooding on- or offsite?	☐	☐	☐	☒	☐
e) Create or contribute runoff water which would exceed the capacity of existing or planned stormwater drainage systems or provide substantial additional sources of polluted runoff?	☐	☐	☒	☐	☐
f) Otherwise substantially degrade water quality?	☐	☐	☒	☐	☐
g) Place housing within a 100-year flood hazard area as mapped on a federal Flood Hazard Boundary or Flood Insurance Rate Map or other authoritative flood hazard delineation map?	☐	☐	☐	☐	☒
h) Place within a 100-year flood hazard area structures that would impede or redirect flood flows?	☐	☐	☐	☐	☒
i) Expose people or structures to a significant risk of loss, injury or death involving flooding, including flooding as a result of the failure of a levee or dam?	☐	☐	☐	☒	☐
j) Expose people or structures to a significant risk of loss, injury or death involving inundation by seiche, tsunami, or mudflow?	☐	☐	☐	☒	☐

The project site is not located within a 100-year flood hazard area. As discussed above, the project site is not in an area subject to tsunami run-up, or reservoir inundation hazards (Maps 6, and 7 in the *General Plan* Community Safety Element). Groundwater is not used as a drinking water supply in the City and County of San Francisco.

WATER QUALITY

The proposed project would not substantially degrade water quality or contaminate a public water supply. All wastewater from the proposed project building expansion, and stormwater runoff from the project site, would flow into the city's combined sewer system to be treated at the Southeast Water Pollution Control Plant prior to discharge into San Francisco Bay. Treatment would be provided pursuant to the effluent discharge standards contained in the City's National Pollutant Discharge Elimination System (NPDES) permit for the plant. During operations and construction, the proposed project would be required to comply with all local wastewater discharge and water quality requirements. Therefore, the proposed project would not substantially degrade water quality.

GROUNDWATER RESOURCES

As discussed in Topic 13. Geology and Soils, above, groundwater was encountered in test borings at depths of 23 to 30 feet. The depth to the free groundwater may fluctuate with the seasons.

Due to the anticipated depth of excavation of approximately 12 feet below the existing sidewalk, dewatering could be required during excavation. The Bureau of System Planning, Environment and Compliance of the Public Utilities Commission must be notified of projects requiring dewatering, and may require groundwater analysis before discharge. Any groundwater discharged during construction of the proposed project would be subject to requirements of the City's Industrial Waste Ordinance (Ordinance Number 199-77) that groundwater meet specified water quality standards before it may be discharged into the sewer system.

Should dewatering be necessary, the final soils report would address the potential settlement and subsidence impacts of this dewatering. Based on this discussion, the soils report would determine whether a lateral movement and settlement survey should be done to monitor any movement or settlement of surrounding buildings and adjacent streets. If a monitoring survey were recommended, DBI would require that a Special Inspector (as defined in Article 3 of the *Building Code*) be retained by the project sponsor to perform this monitoring. Groundwater observation wells might be installed to monitor potential settlement and subsidence. If, in the judgment of the Special Inspector, unacceptable movement were to occur during construction, groundwater recharge would be used to halt this settlement. The project sponsor would delay construction if necessary. Costs for the survey and any necessary repairs to service lines under the street would be borne by the project sponsor. If dewatering were necessary, the project sponsor and its contractor would follow the geotechnical engineers' recommendations regarding dewatering to avoid settlement of adjacent streets, utilities, and buildings that could potentially occur as a result of dewatering.

The project site is virtually completely covered with impervious surfaces and natural groundwater flow would continue under and around the site. Construction of the proposed project would not substantially increase impervious surface coverage on the site nor reduce infiltration and groundwater recharge. Therefore, the proposed project would not substantially alter existing groundwater quality or surface flow conditions.

EROSION AND FLOODING

As noted above, the project site is virtually completely covered with impervious surfaces and the proposed project would include a green wall and roof which would capture and reuse stormwater wherever possible, representing a decrease from existing conditions in the amount of impervious surfaces on the project site. As a result, no increase in the quantity and rate of stormwater runoff from the site that flows to the city's combined sewer system would be expected, and there may be a decrease. Any site runoff would continue to drain to the city's combined storm and sanitary sewer. The basement area of the building addition would be water tight to avoid the need to permanently pump and discharge water. Because stormwater flows from the proposed project could be accommodated by the existing combined sewer system, and because there would be no expected increase in stormwater flows, the proposed project would not significantly impact surface or ground water quality nor cause substantial flooding or erosion.

Over the construction period, there would be a potential for erosion and transportation of soil particles during site preparation, excavation, foundation pouring, and construction of the building shell. Once in surface water runoff, sediment and other pollutants could leave the construction site and ultimately be released into San Francisco Bay. As discussed above, stormwater runoff from project construction would drain to the combined sewer and stormwater system and be treated at the Southeast Water Pollution Control Plant. Pursuant to *Building Code* Chapter 33 (Excavation and Grading) and the City's NPDES permit, the project sponsor would be required to implement measures to reduce potential erosion impacts. Therefore, the proposed project would not substantially degrade water quality.

The City of San Francisco does not currently participate in the National Flood Insurance Program (NFIP) and no flood maps are published for the City. However, the Federal Emergency Management Agency (FEMA) is revising Flood Insurance Rate Maps (FIRMs), which support the NFIP, for San Francisco Bay Area communities. As part of this effort, FEMA plans to prepare a FIRM for the City and County of San Francisco for the first time. On September 21, 2007, FEMA issued a preliminary FIRM of San Francisco.

The preliminary map is for review and comment only; FEMA anticipates that the final map will be published in September 2008.[15] FEMA has tentatively identified special flood hazard areas (SFHAs)[16] along the City's shoreline in and along the San Francisco Bay consisting of "A zones" (areas subject to inundation by tidal surge) and "V zones" (areas subject to the additional hazards that accompany wave action). According to the preliminary map, the Drew School Addition project site is not within an A zone or a V zone.[17] In addition, there are no natural waterways within or near the project site that could cause stream-related flooding. The project site is not located within an area that would be flooded as the result of failure of a levee or dam,[18] nor is it located in an area identified for potential inundation in the event of a tsunami along the San Francisco coast, based on a 20-foot water level rise at the Golden Gate (Map 6 of the Community Safety Element of the *San Francisco General Plan*). In addition, the relatively flat and developed area of the project site would not be subject to mudflow. [19] Therefore, Checklist items 14g – 14j are not applicable to the project.

Based on the information presented above, the proposed project would not have significant water quality, groundwater, flooding, or erosion impacts nor be at risk from dam or levee failure or from seiche, tsunami, or mudflow inundation. Therefore, these topics will not be discussed further in the EIR.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
15. **HAZARDS AND HAZARDOUS MATERIALS**—Would the project:					
a) Create a significant hazard to the public or the environment through the routine transport, use, or disposal of hazardous materials?	☐	☐	☒	☐	☐

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[15] City and County of San Francisco, Office of the City Administrator, National Flood Insurance Program Flood Sheet, http://www.sfgov.org/site/uploadedfiles/risk_management/factsheet.pdf, accessed November 12, 2007.

[16] A special flood hazard area is the flood plain that is at risk from the 100-year flood (a flood having a one-percent chance of occurrence in a given year).

[17] Federal Emergency Management Agency, Preliminary Flood Insurance Rate Map, City and County of San Francisco, California, Panel 120, September 21, 2007, available on the Internet at http://www.sfgov.org/site/uploadedimages/risk_management/j120A_jpg.jpg, accessed November 12, 2007.

[18] ABAG, http://www.abag.ca.gov/cgi-bin/pickdamx.pl, accessed February 25, 2008.

[19] City and County of San Francisco, *City and County of San Francisco Emergency Operations Plan,*January 2005.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
b) Create a significant hazard to the public or the environment through reasonably foreseeable upset and accident conditions involving the release of hazardous materials into the environment?	☐	☒	☐	☐	☐
c) Emit hazardous emissions or handle hazardous or acutely hazardous materials, substances, or waste within one-quarter mile of an existing or proposed school?	☐	☒	☐	☐	☐
d) Be located on a site which is included on a list of hazardous materials sites compiled pursuant to *Government Code* Section 65962.5 and, as a result, would it create a significant hazard to the public or the environment?	☐	☐	☐	☒	☐
e) For a project located within an airport land use plan or, where such a plan has not been adopted, within two miles of a public airport or public use airport, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
f) For a project within the vicinity of a private airstrip, would the project result in a safety hazard for people residing or working in the project area?	☐	☐	☐	☐	☒
g) Impair implementation of or physically interfere with an adopted emergency response plan or emergency evacuation plan?	☐	☐	☒	☐	☐
h) Expose people or structures to a significant risk of loss, injury or death involving fires?	☐	☐	☒	☐	☐

PROJECT SITE

The project site has been continuously occupied by the existing three-story residential structure since its construction in 1891.

A Phase I Environmental Site Assessment (ESA) was prepared for the project site.[29] An ESA assesses possible environmental concerns related to onsite or nearby chemical use, storage, handling, spillage, and/or onsite disposal, with particular focus on potential degradation of soil or groundwater quality. The ESA also reviews the land use history of the project site and operating practices at or near the site to assess potential hazards from reported chemical releases on nearby properties and the potential migration of chemicals, contaminants, and toxics onto the project site.

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[29] Innovative & Creative Environmental Solutions (ICES), *Phase I Environmental Site Assessment, 1831-1835 Broderick Street, San Francisco, California,* January 10, 2007. This report is on file and available for public review by appointment at the San Francisco Planning Department at 1650 Mission Street as part of Case No. 2007.0128E.

A site inspection conducted for the Phase I ESA did not indicate the presence of transformers, aboveground or underground storage tanks, drums, or wells at the site. The project site is not on the Hazardous Waste and Substances Sites List, commonly called the "Cortese List," compiled by the California Department of Toxic Substances Control (DTSC) pursuant to *Government Code* Section 65962.5. The project site is not listed in database reports from State and federal regulatory agencies that identify businesses and properties that handle or have released hazardous materials or waste.

SURROUNDING AREA

Surrounding property historically has been used primarily for residential purposes, in addition to the Drew School and the church located northeast of the site. In the database reports from State and federal regulatory agencies mentioned above, a total of 184 cases with possible releases of chemicals of concern to the environment were identified in the site vicinity within the area of the search. All of these cases are considered not to have impacted the project site because they have a status of no further action (NFA), were de-listed, have no reported violations, are approximately one-eighth mile or greater from the project site, and/or are cross- or down-gradient from the site. An NFA or de-listed status for a site/case indicates that chemical releases to the environment had not occurred or had been successfully remediated. Sites/cases with a "No Violations" notation have not had known releases of chemicals into the environment. The local topography suggests that local groundwater gradient flows in a southeasterly direction. It is, therefore, unlikely that properties situated in the cross- or down-gradient locations of the site could have impacted the site through groundwater flow.

Files at the San Francisco Department of Public Health (SFDPH) contain records of two nearby sites identified by the database reports mentioned above: 2890 California Street and 2952 California Street. At 2890 California Street, located north of the project site, one 1,500-gallon underground storage tank (UST) was removed in February 1995. Soil samples collected beneath the UST indicated total petroleum hydrocarbon (TPH) as diesel (TPHd) ranging from 2 mg/kg to 370 mg/kg, and non-detectable concentrations of benzene, toluene, ethylbenzene, and xylenes (BTEX). The affected soil was over-excavated and disposed offsite. Soil samples collected following over-excavation indicated non-detectable concentrations of TPHd and BTEX. The site received a no further action status and regulatory case closure by SFDPH on August 16, 1995.

At 2952 California Street, located northwest of the project site, one 1,500-gallon underground storage tank (UST) was removed in April 1995. Soil samples collected beneath the UST indicated TPHd concentrations ranging from 65 mg/kg to 377 mg/kg, and non-detectable concentrations of BTEX. The affected soil was over-excavated and disposed offsite. Soil samples collected following over-excavation indicated non-detectable concentrations of TPHd and BTEX. The site received a no further action status and regulatory case closure by SFDPH on May 26, 1995.

Based on the information discussed above, the Phase I ESA found no environmental conditions at or near the site that require further investigation, but recommended that asbestos and lead surveys be conducted prior to demolition of the existing building (see Hazardous Building Materials, below).

HAZARDOUS BUILDING MATERIALS

Asbestos

Asbestos-containing materials may be found within the existing structure on the southern portion of the project site, which was constructed in 1891 and is proposed to be demolished as part of the project. Section 19827.5 of the *California Health and Safety Code*, adopted January 1, 1991, requires that local agencies not issue demolition or alteration permits until an applicant has demonstrated compliance with notification requirements under applicable federal regulations regarding hazardous air pollutants, including asbestos. The BAAQMD is vested by the California legislature with authority to regulate airborne pollutants, including asbestos, through both inspection and law enforcement, and is to be notified ten days in advance of any proposed demolition or asbestos abatement work. The notification must include: (1) the names and addresses of the operations; (2) the names and addresses of persons responsible; and (3) the location and description of the structure to be demolished/altered, including size, age, and prior use, and the approximate amount of friable asbestos; (4) scheduled starting and completion dates of demolition or asbestos abatement work; (5) nature of the planned work and methods to be employed; (6) procedures to be employed to meet BAAQMD requirements; (7) and the name and location of the waste disposal site to be used. The BAAQMD randomly inspects asbestos removal operations. In addition, the BAAQMD will inspect any removal operation about which a complaint has been received.

Any ACBM disturbance at the project site would be subject to the requirements of BAAQMD Regulation 11, Rule 2: Hazardous Materials; Asbestos Demolition, Renovation and Manufacturing.

The local office of the State Occupational Safety and Health Administration must also be notified of asbestos abatement to be carried out. Asbestos abatement contractors must follow State regulations contained in 8CCR1529 and 8CCR341.6 through 341.14 where there is asbestos-related work involving 100 square feet or more of asbestos containing material. Asbestos removal contractors must be certified as such by the Contractors Licensing Board of the State of California. The owner of the property where abatement is to occur must have a Hazardous Waste Generator Number assigned by and registered with the Office of the California Department of Health Services in Sacramento. The contractor and hauler of the material are required to file a Hazardous Waste Manifest that details the hauling of the material from the site and the disposal of it. Pursuant to California Law, DBI would not issue the required permit until the applicant has complied with the notice requirements described above.

These regulations and procedures established as part of the permit review process would ensure that any potential impacts due to asbestos would be reduced to a less-than-significant level.

Lead-Based Paint

Lead paint may be found in the existing building on the southern portion of the project site, constructed in 1891 and proposed for demolition as part of the project. Demolition must be conducted in compliance with Section 3407 of the *San Francisco Building Code (Building Code),* Work Practices for Exterior Lead-Based Paint on Pre-1979 Buildings and Steel Structures. Where there is any work that may disturb or remove lead paint on the exterior of any building, or the interior of occupied buildings (E3, R1, or R3 occupancy classifications) built prior to or on December 31, 1978, Section 3407 requires specific notification and work standards, and identifies prohibited work methods and penalties.

Section 3407 applies to buildings or steel structures on which original construction was completed prior to 1979, which are assumed to have lead-based paint on their surfaces unless a certified lead inspector/assessor tests surfaces for lead and determines it is not present according to the definitions of Section 3407. The ordinance contains performance standards, including establishment of containment barriers, at least as effective at protecting human health and the environment as those in HUD Guidelines (the most recent Guidelines for Evaluation and Control of Lead-Based Paint Hazards) and identifies prohibited practices that may not be used in disturbance or removal of lead-based paint. Any person performing work subject to the ordinance shall make all reasonable efforts to prevent migration of lead paint contaminants beyond containment barriers during the course of the work, and any person performing regulated work shall make all reasonable efforts to remove all visible lead paint contaminants from all regulated areas of the property prior to completion of the work.

The Ordinance also includes notification requirements, contents of notice, and requirements for project site signs. Prior to commencement of exterior work that disturbs or removes 100 or more square feet or 100 or more linear feet of lead-based paint in total, the responsible party must provide the Director of the DBI with written notice that describes the address and location of the proposed project; the scope and specific location of the work; whether the responsible party has reason to know or presume that lead-based paint is present; the methods and tools for paint disturbance and/or removal; the approximate age of the structure; anticipated job start and completion dates for the work; whether the building is residential or nonresidential; whether it is owner-occupied or rental property; the approximate number of dwelling units, if any; the dates by which the responsible party has or will fulfill any tenant or adjacent property notification requirements; and the name, address, telephone number, and pager number of the party who will perform the work. Further notice requirements include: a Post Sign notifying the public of restricted access to work area, a Notice to Residential Occupants, Availability of Pamphlet related to protection from lead in the home, and Early Commencement of Work (by Owner, Requested by Tenant), and Notice of Lead Contaminated Dust or Soil, if applicable. The ordinance contains provisions regarding inspection and sampling for compliance by DBI, and enforcement, and describes penalties for non-compliance with the requirements of the ordinance.

These regulations and procedures, already established as part of the building permit review process, would ensure that potential impacts of the proposed project due to the presence of lead-based paint would be reduced to a less-than-significant level.

OTHER POTENTIAL HAZARDOUS BUILDING MATERIALS

In addition to asbestos-containing building materials and lead-based paint, the existing buildings on the project site may contain other potentially hazardous building materials such as polychlorinated biphenyl (PCB), contained primarily in exterior paint, sealants, electrical equipment, and fluorescent light fixtures. Fluorescent light bulbs are also regulated (for their disposal) due to their mercury content. Inadvertent release of such materials during demolition could expose construction workers, occupants, or visitors to these substances and could result in various adverse health effects if exposure were of sufficient quantity.

Although abatement or notification programs described above for asbestos and lead-based paint have not been adopted for PCB, mercury, other lead-containing materials, or other possible hazardous materials, items containing these substances that are intended for disposal must be managed as hazardous waste and handled in accordance with OSHA worker protection requirements. Potential impacts associated with encountering hazardous building materials such as PCB, mercury, and lead would be considered a potentially significant impact. Hazardous building materials sampling and abatement pursuant to existing regulations prior to demolition, as described in **Mitigation Measure 3, page 78** would reduce potential impacts associated with PCB, mercury, lead, and other toxic building substances in structures to a less-than-significant level. With **Mitigation Measure 3** implemented, the proposed demolition and construction of the school addition would not have the potential to pose a direct (through material removal, if required) or indirect (through transport of materials or accidental release) public health hazard to the surrounding neighborhood.

BUILDING OPERATION HAZARDS

Operating the educational building expansion would involve handling a range of common types of hazardous commercial and household products, such as paints, cleaners, toners, solvents, disinfectants, and detergents. Businesses are required by law to ensure employee safety by identifying hazardous commercial products, and adequately training workers. Household products are labeled to inform users of potential risks and to instruct them in appropriate storage, handling, and disposal procedures. For these reasons, hazardous materials use for operating the proposed building addition would not pose a substantial public health or safety hazards to the surrounding area.

FIRE HAZARDS

San Francisco ensures fire safety primarily through provisions of the *Building* and *Fire Codes*. The proposed project would conform to these standards, which will also include development of an emergency procedure manual and an exit drill plan. In this way, potential fire hazards (including those associated with hydrant water pressure and emergency access) would be mitigated during the permit review process. The project is an addition to a school and will incorporate the emergency procedure manual and an exit drill plan that are already in place in accordance with state law. Therefore, the proposed project would not expose people or structures to a significant risk of loss, injury or death involving fires.

OTHER HAZARDS

The project site is not located within an airport land use plan area, or in the vicinity of a private airstrip. As noted above, the proposed project would incorporate the emergency procedures and exit drill plan already in place for the school. The proposed project would not impair implementation of or physically interfere with any adopted emergency response or evacuation plans.

CONCLUSION

Potential public health and safety hazards related to the possible presence of hazardous materials on the project site, to the routine use of hazardous materials, and to potential fire hazards in the proposed building expansion would be reduced to a less-than-significant level as a result of regulations and procedures already established as part of the building permit review process and **Mitigation Measure 3, page 78**. The EIR will therefore not further discuss hazardous materials.

Topics:	*Potentially Significant Impact*	*Less Than Significant with Mitigation Incorporated*	*Less Than Significant Impact*	*No Impact*	*Not Applicable*
16. **MINERAL AND ENERGY RESOURCES—** Would the project:					
a) Result in the loss of availability of a known mineral resource that would be of value to the region and the residents of the state?	☐	☐	☐	☒	☐
b) Result in the loss of availability of a locally important mineral resource recovery site delineated on a local general plan, specific plan or other land use plan?	☐	☐	☐	☒	☐
c) Encourage activities which result in the use of large amounts of fuel, water, or energy, or use these in a wasteful manner?	☐	☐	☒	☐	☐

No mineral resources are located on or near the project site; therefore the proposed project would not affect mineral resources. The proposed project would be an addition to an existing school and would not consume large amounts of fuel, water, or energy. Electric generation to serve the proposed project would consume additional natural gas and coal fuel. New buildings in San Francisco are required to conform to current state and local conservation standards, including Title 24 of the *California Code of Regulations*. DBI enforces Title 24 compliance and documentation demonstrating compliance with these standards is submitted with the application for the building permit.

As part of the LEED certification process, the project sponsor intends for the project to be 21 to 24 percent better than the Title 24 standards. The project team would pursue a displacement air distribution system as an efficient way to deliver heat and provide temperature control. With this system, heat and/or cooled air will be placed down low in the space where it can most efficiently serve the needs of those using the space. Classrooms will be served by individual fan coil units connected to a variable refrigerant volume system and all windows are planned to be operable with a switch at each window, which will turn off the A/C when the windows are open.

The proposed project would not use substantial quantities of other non-renewable natural resources, or use fuel or water in an atypical or wasteful manner.

San Francisco consumers have experienced rising energy costs and uncertainties regarding the supply of electricity. The root causes of these conditions are under investigation and are the subject of much debate. Part of the problem may be that the State does not generate sufficient energy to meet its demand and must import energy from outside sources. Another part of the problem may be the lack of cost controls as a result of deregulation. The California Energy Commission (CEC) is currently considering applications for the development of new power-generating facilities in San Francisco, the Bay Area, and elsewhere in the State. These facilities could supply additional energy to the power supply "grid" within the next few years. These efforts, together with conservation, would be part of the statewide effort to achieve energy sufficiency. The project-generated demand for electricity would be negligible in the context of overall demand within San Francisco and the State, and would not in and of itself require a major expansion of power facilities. Therefore, the energy demand associated with the proposed project would not result in a significant physical environmental effect or contribute to a cumulative impact.

The proposed project would therefore not have a significant project-specific or cumulative effect on mineral or energy resources, and these topics will not be further discussed in the EIR.

Topics:	Potentially Significant Impact	Less Than Significant with Mitigation Incorporated	Less Than Significant Impact	No Impact	Not Applicable
17. AGRICULTURE RESOURCES					
In determining whether impacts to agricultural resources are significant environmental effects, lead agencies may refer to the California Agricultural Land Evaluation and Site Assessment Model (1997) prepared by the California Department of Conservation as an optional model to use in assessing impacts on agriculture and farmland. Would the project:					
a) Convert Prime Farmland, Unique Farmland, or Farmland of Statewide Importance, as shown on the maps prepared pursuant to the Farmland Mapping and Monitoring Program of the California Resources Agency, to non-agricultural use?	☐	☐	☐	☐	☒
b) Conflict with existing zoning for agricultural use, or a Williamson Act contract?	☐	☐	☐	☐	☒
c) Involve other changes in the existing environment which, due to their location or nature, could result in conversion of Farmland of Statewide Importance, to non-agricultural use?	☐	☐	☐	☐	☒

The project site is located in a thoroughly developed urban area, within the City and County of San Francisco. No land within City boundaries is identified as Prime Farmland, Unique Farmland, or Farmland of Statewide Importance on the Farmland Mapping and Monitoring Program maps. No land within City boundaries is designated as Williamson Act properties, or identified as important farmland by the California Department of Conservation.[30] The site is not zoned for potential agricultural use. Accordingly topics 17(a), (b), and (c) are not applicable to the proposed project, and will not be discussed in the EIR.

F. MITIGATION MEASURES AND IMPROVEMENT MEASURES

The following are mitigation measures related to environmental effects determined to require no analysis in the EIR. The EIR will contain a mitigation chapter listing these measures as well as other measures that would be adopted to reduce potential adverse effects of the project identified in the EIR.

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[30] San Francisco is identified as "Urban and Built Up Land" on the California Department of Conservation *Important Farmland of California Map*, 2002. This map is available for viewing on-line at the Department of Conservation website (http://www.consrv.ca.gov).

MITIGATION MEASURES

The following mitigation measures have been adopted by the project sponsor and are necessary to reduce potential construction-related archeological, air quality, and hazardous building material impacts to a less-than-significant level.

Mitigation Measure 1

Archeological Resources (Accidental Discovery)

The following mitigation measure is required to avoid any potential adverse effect from the proposed project on accidentally discovered buried or submerged historical resources as defined in *CEQA Guidelines* Section 15064.5(a)(c). The project sponsor shall distribute the Planning Department archeological resource "ALERT" sheet to the project prime contractor; to any project subcontractor (including demolition, excavation, grading, foundation, pile driving, etc. firms); or utilities firm involved in soils disturbing activities within the project site. Prior to any soils disturbing activities being undertaken each contractor is responsible for ensuring that the "ALERT" sheet is circulated to all field personnel including, machine operators, field crew, pile drivers, supervisory personnel, etc. The project sponsor shall provide the Environmental Review Officer (ERO) with a signed affidavit from the responsible parties (prime contractor, subcontractor(s), and utilities firm) to the ERO confirming that all field personnel have received copies of the Alert Sheet.

Should any indication of an archeological resource be encountered during any soils disturbing activity of the project, the project Head Foreman and/or project sponsor shall immediately notify the ERO and shall immediately suspend any soils disturbing activities in the vicinity of the discovery until the ERO has determined what additional measures should be undertaken.

If the ERO determines that an archeological resource may be present within the project site, the project sponsor shall retain the services of a qualified archeological consultant. The archeological consultant shall advise the ERO as to whether the discovery is an archeological resource, retains sufficient integrity, and is of potential scientific/historical/cultural significance. If an archeological resource is present, the archeological consultant shall identify and evaluate the archeological resource. The archeological consultant shall make a recommendation as to what action, if any, is warranted. Based on this information, the ERO may require, if warranted, specific additional measures to be implemented by the project sponsor.

Measures might include: preservation in situ of the archeological resource; an archaeological monitoring program; or an archeological testing program. If an archeological monitoring program or archeological testing program is required, it shall be consistent with the Major Environmental Analysis (MEA) division guidelines for such programs. The ERO may also require that the project sponsor immediately implement a site security program if the archeological resource is at risk from vandalism, looting, or other damaging actions.

The project archeological consultant shall submit a Final Archeological Resources Report (FARR) to the ERO that evaluates the historical significance of any discovered archeological resource and describing the archeological and historical research methods employed in the archeological monitoring/data recovery program(s) undertaken. Information that may put at risk any archeological resource shall be provided in a separate removable insert within the final report.

Copies of the Draft FARR shall be sent to the ERO for review and approval. Once approved by the ERO, copies of the FARR shall be distributed as follows: California Archaeological Site Survey Northwest Information Center (NWIC) shall receive one (1) copy and the ERO shall receive a copy of the transmittal of the FARR to the NWIC. The Major Environmental Analysis division of the Planning Department shall receive three copies of the FARR along with copies of any formal site recordation forms (CA DPR 523 series) and/or documentation for nomination to the National Register of Historic Places/California Register of Historical Resources. In instances of high public interest or interpretive value, the ERO may require a different final report content, format, and distribution than that presented above.

Mitigation Measure 2

Construction Air Quality

The following measures from the BAAQMD *CEQA Guidelines* would reduce construction air quality impacts to a less-than-significant level. The project sponsor shall:

- Water all construction areas at least twice daily.
- Cover all trucks hauling soil, sand, and other loose materials *or* require all trucks to maintain at least two feet of freeboard.
- Apply water three times daily, or apply (non-toxic) soil stabilizers on all unpaved access roads, parking areas, and staging areas at construction sites.
- Sweep daily (with water sweepers) if visible soil material is carried onto adjacent streets.

- Install wheel washers for all existing trucks, or wash off the tires or tracks of all trucks and equipment leaving the site.
- Install windbreaks, or plant trees/vegetative breaks at windward side(s) of construction areas.
- Suspend excavation and grading activity when winds (instantaneous gusts) exceed 25 mph.
- Limit the area subject to excavation, grading, and other construction activity at any one time.

Ordinance No. 175-91, passed by the Board of Supervisors on May 6, 1991, requires that non-potable water be used for dust control activities. The project sponsor shall require the construction contractor(s) to obtain reclaimed water from the Clean Water Program for this purpose.

The project sponsor shall require the project contractor(s) to maintain and operate construction equipment so as to minimize exhaust emissions of particulates and other pollutants, by such means as prohibiting idling motors when equipment is not in use or when trucks are waiting in queues, and implementing specific maintenance programs to reduce emissions for equipment that would be in frequent use for much of the construction period.

Mitigation Measure 3

Hazardous Building Materials (PCB, Mercury, Lead, and Others)

Prior to demolition of the structure on site, the project sponsor shall ensure that pre-construction building surveys for PCB- and mercury-containing equipment, fluorescent lights, lead, mercury and other potentially toxic building materials are performed. Any hazardous building materials so discovered shall be abated according to federal, state, and local laws and regulations.

IMPROVEMENT MEASURES

Improvement measures are recommendations to diminish the effects of the project that were found to result in less-than-significant impacts. Improvement measures designed to reduce already less-than-significant impacts are listed below, and would be implemented, with agreement from the project sponsor, and included in an update of existing Conditions of Approval through the Conditional Use authorization. Measures which add to or expand upon existing Conditions of Approval are noted. The existing conditions of approval will be reprinted in the EIR

Improvement Measure 1

Extend White Zone Along Broderick Street

The project sponsor would seek to extend the white zone on Broderick Street to California Street. If the DPT determines the measure feasible, extending the current white zone for student drop-off and pick-up would add two more parking spaces, and an extended white zone at this location would minimize double parking on Broderick Street. This measure would extend the white zone identified in the 1999 Conditional Use application to match the extended frontage of the Drew School Addition currently proposed.

Improvement Measure 2

Modify Timing of Operation of White Zone

The signage for the existing white zone on Broderick Street in front of the school is from 8:00 to 8:30 a.m. and from 1:30 to 3:30 p.m. Because there would be no need for student pickups until 3:00 p.m. from Monday to Thursday and until 2:30 p.m. for Fridays, the afternoon white zone period could be modified if the DPT determines the measure feasible. If determined feasible by the DPT, this measure would reduce the hours restricted for pick-up from the white zone fronting the project site, as reflected by signage.

Improvement Measure 3

Educational Campaign and Implementation of School Pick-up/Drop-off Policy

The school would conduct a more aggressive educational campaign, such as including the school pick-up/drop-off policy on the school web site, in a flyer to be distributed in the student registration package, parent contracts, and in General Assembly every semester. The school would note the license plate number of offending drivers, and send a courtesy letter explaining the violation of the school policy. This measure would expand on efforts identified in the 1999 Conditional Use application.

Improvement Measure 4

Encourage Alternate Modes of Travel

The school would seek to meet a "no net increase" on parking demand through encouraging use of alternative modes. The project sponsor would provide a transportation packet for the project faculty/employees and students that would provide information on bike routes, specific transit service (stop locations, MUNI and BART lines, schedules and fares, matching school arrival and departure times), information on where FastPasses could be purchased, and information on the 511 Regional Rideshare Program. The school would seek the cooperation of the parent organization to arrange carpooling and incentivize participation. This measure would expand on efforts identified in the 1999 Conditional Use application.

Improvement Measure 5

Construction Traffic Measures

The following measures would minimize disruption of the general traffic flow on adjacent streets:

- To the extent possible, truck movements should be limited to the hours between 9:00 a.m. and 3:30 p.m. (or other times, if approved by the Department of Parking and Traffic [DPT]).

  The project sponsor and construction contractor(s) would meet with the Traffic Engineering Division of the Department of Parking and Traffic (DPT), the Police Department, the Fire Department, Muni's Street Operations and Special Events Office, the Planning Department, and other City agencies to determine feasible traffic measures to reduce traffic congestion and other potential transit disruption and pedestrian circulation effects during construction of the project, including temporary relocation of the existing white zone from Broderick Street to California Street during the construction period.
- The construction contractor would hire a flagman to direct construction vehicle ingress and egress, and barricades and fences would be used to secure the construction site.

Improvement Measure 6

Construction Noise Measures

The following standard measures, if implemented, would reduce the proposed project's construction noise impact on nearby sensitive receptors.

- Construction hours would be limited to the hours between 7:00 AM and 8:00 PM. A special permit should not be granted to extend hours unless there is an emergency because of the proximity of residential receptors.
- All internal combustion-driven construction equipment would be properly muffled and maintained. If an individual piece of construction equipment generates noise levels exceeding the noise limits set forth in the San Francisco Noise Ordinance, it would cease operating until it can be modified or replaced.
- Utilize "quiet" models of air compressors and other stationary noise sources where technology exists.
- Locate stationary noise-generating equipment as far as possible from sensitive receptors when sensitive receptors adjoin or are near a construction project area.
- Prohibit unnecessary idling of internal combustion engine.
- Erect temporary portable noise control screens around the area where the concrete saw is operating.
- Designate a "noise disturbance coordinator" who would be responsible for responding to any local complaints about construction noise. The disturbance coordinator would determine the cause of the noise complaints (e.g., starting too early, bad muffler, etc.) and institute reasonable measures warranted to correct the problem. Conspicuously post a telephone number for the disturbance coordinator at the construction site.

In addition to the above standard measures, the measures below would further reduce the proposed project's construction noise impact on school and nearby church operations.

- The noise disturbance coordinator would coordinate with school administrators to minimize classroom disruption caused by impact and other tools during the construction period.
- The noise disturbance coordinator would coordinate construction activities with the Seventh Day Adventist Church (2889 California Street, at the southeast corner of Broderick and California Streets) in order to limit the use of impact tools during weekend and evening church services.

This improvement measure was not identified in the 1999 Conditional Use application.

G. ALTERNATIVES

Alternatives to the proposed project would be defined further and described in the EIR. At a minimum, the alternatives analyzed would include the following:

1. A *No Project Alternative* in which the project site would remain in its existing condition with the existing buildings on the site, including the residential building at 1831-1835 Broderick Street.
2. A *Preservation Alternative,* expanding use only, in which the existing historic building on the southern portion of the site (1831-1835 Broderick Street) would be rehabilitated in

compliance with the Secretary of the Interior's standards and adaptively reused as part of the Drew School.

3. A ***Partial Preservation Alternative*** in which a segment of the existing historic building on the street-facing southern portion of the site (1831-1835 Broderick Street) would be retained as part of an expansion of the Drew School.

4. A ***Residential Guidelines Alternative*** in which new construction would be undertaken according to guidelines for historic districts and in conformity with the Residential Design Guidelines.

H. PERMITS

The proposed project would require the following approvals:

- Conditional Use authorization (under *Planning Code* Section 303) for a school use in a RM-1 district *Planning Code* Section 209.3(h)). This authorization would amend the 1999 Conditional Use authorization for the existing school and increase the enrollment from 250 to 280 students.
- Variance (under *Planning Code* Section 305) from the rear yard requirement to provide necessary assembly space in the new building. (*Planning Code* Section 134(a)(2)).
- Discretionary Review by the Planning Commission for demolition of the three residential units on the project site. (*Planning Code* Section 311).

The project also would require approval by the Department of Building Inspection (DBI) for demolition and site or building permits, and approval by the Bureau of Streets and Mapping of the Department of Public Works for a parcel map merging Lot 3 and Lot 95, and street and sidewalk permits. Any curb or road modifications would require approval by the Department of Parking and Traffic.

The 1999 Conditional Use authorization allowed for the reconstruction and intensification of the existing school including increased enrollment from 200 to 250; provision of a 21- to 23-space parking garage, and the creation of a passenger loading zone on Broderick Street,[20] All the conditions of the original authorization would continue with the exception of the increase of enrollment to 280 students and the addition of the assembly wing.

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[20] Other conditions included prevention of student loitering in residential areas, containment of noise and light on school premises, prevention of double parking, encourage use of public transit and alternative means of transportation, appointment of a community liaison officer, provision of a traffic control monitor, and limitation of special evening and weekend events to two a month.

I. MANDATORY FINDINGS OF SIGNFICANCE

		Potentially Significant Impact	Less Than Significant with Mitigation Incorporation	Less Than Significant Impact	No Impact	Not Applicable
	Would the project:					
a)	Have the potential to degrade the quality of the environment, substantially reduce the habitat of a fish or wildlife species, cause a fish or wildlife population to drop below self-sustaining levels, threaten to eliminate a plant or animal community, reduce the number or restrict the range of a rare or endangered plant or animal, or eliminate important examples of the major periods of California history or prehistory?	☒	☐	☐	☐	☐
b)	Have impacts that would be individually limited, but cumulatively considerable? ("Cumulatively considerable" means that the incremental effects of a project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.)	☒	☐	☐	☐	☐
c)	Have environmental effects that would cause substantial adverse effects on human beings, either directly or indirectly?	☐	☒	☐	☐	☐

Mitigation Measures 1 to 3, contained in Section F. above, have been incorporated into the proposed project to address potential construction-related impacts to archeological resources, air quality, and hazardous building materials. Implementation of these measures would reduce these potential impacts of the proposed project to a less-than-significant level. The proposed project would have a significant effect on historic architectural resources, as the existing building to be demolished is a contributory historical architectural resource to a potential historic district. For this reason, demolition of the structure would also be a significant cumulative impact. Therefore, historic architectural resource impacts will be analyzed in the EIR and compared among project alternatives.

J. DETERMINATION

On the basis of this initial study:

☐ I find that the proposed project COULD NOT have a significant effect on the environment, and a NEGATIVE DECLARATION will be prepared.

☐ I find that although the proposed project could have a significant effect on the environment, there will not be a significant effect in this case because revisions in the project have been made by or agreed to by the project proponent. A MITIGATED NEGATIVE DECLARATION will be prepared.

☒ I find that the proposed project MAY have a significant effect on the environment, and an ENVIRONMENTAL IMPACT REPORT is required.

☐ I find that the proposed project MAY have a "potentially significant impact" or "potentially significant unless mitigated" impact on the environment, but at least one effect (1) has been adequately analyzed in an earlier document pursuant to applicable legal standards, and (2) has been addressed by mitigation measures based on the earlier analysis as described on attached sheets. An ENVIRONMENTAL IMPACT REPORT is required, but it must analyze only the effects that remain to be addressed.

☐ I find that although the proposed project could have a significant effect on the environment, because all potentially significant effects (a) have been analyzed adequately in an earlier EIR or NEGATIVE DECLARATION pursuant to applicable standards, and (b) have been avoided or mitigated pursuant to that earlier EIR or NEGATIVE DECLARATION, including revisions or mitigation measures that are imposed upon the proposed project, no further environmental documentation is required.

DATE March 6, 2008

Bill Wycko
Acting Environmental Review Officer
for
John Rahaim
Director of Planning

K. LIST OF PREPARERS

EIR Authors

Planning Department, City and County of San Francisco
Major Environmental Analysis
1650 Mission Street, Suite 500
San Francisco, CA 94103
Environmental Review Officer: Bill Wycko
EIR Supervisor: Sarah Jones
EIR Coordinator: Leigh Kienker
Preservation Coordinator: Mark Luellen
Preservation Technical Specialist: Tara Sullivan-Lenane

EIR Consultants

During Associates

120 Montgomery Street, Suite 2290
San Francisco, CA 94104
Stu During, Project Manager
Scott Edmondson
Morgan Gillespie

Clement Designs (Graphics Design)

358 Third Avenue, Suite 100
San Francisco, CA 94118
Kathy Clement

Kelley & VerPlanck (Historical Resources)

2912 Diamond Street, #330
San Francisco, California 94131
Tim Kelley

CHS Consulting Group (Transportation)

130 Sutter St Ste 468
San Francisco CA 94104
Chi-Hsin Shao
Byung Lee

ENVIRONMENTAL CONSULTANTS (continued)

Treadwell & Rollo (Geotechnical)

555 Montgomery Street
Suite 1300
San Francisco CA 94111
Frank Rollo
Richard Rodgers

Innovative & Creative Environmental Solutions (Environmental Site Assessment)

3300 Powell Street
Emeryville, CA 94608

Don Ballanti (Air Quality)

1424 Scott St.
El Cerrito, CA 94530

Project Sponsor

Drew School
2901 California Street
San Francisco, CA 94115
Samuel M. Cuddeback III

Project Attorney

Luce, Forward, Hamilton & Scripps LLP
Rincon Center II
121 Spear Street, Suite 200
San Francisco, CA 94105
Denis Shanagher
Alice Suet Yee Barkley

Project Architect

ROMA Design Group
1527 Stockton Street
San Francisco, CA 94133
Bonnie Fisher